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                   UNITED STATES DISTRICT COURT
                 FOR THE NORTHERN DISTRICT OF OHIO
2
                      EASTERN DIVISION
3
    IN RE: NATIONAL
                                    MDL No. 2804
    PRESCRIPTION OPIATE
4
    LITIGATION,
                                     Case No.
                                     1:17-MD-2804
5
                                ) Hon. Dan A.
    THIS DOCUMENT RELATES TO
    ALL CASES
                                   Polster
8
                Thursday, January 10, 2019
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10
       HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
11
                 CONFIDENTIALITY REVIEW
12
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15
           Videotaped Deposition of ROXANNE REED,
     held at 4206 South J.B. Hunt Drive, Rogers,
     Arkansas, commencing at 8:08 a.m., on the
16
     above date, before Debra A. Dibble, Certified
     Court Reporter, Registered Diplomate
17
     Reporter, Certified Realtime Captioner,
     Certified Realtime Reporter and Notary
18
     Public.
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22
               GOLKOW LITIGATION SERVICES
23
             877.370.DEPS | fax 917.591.5672
                     deps@golkow.com
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|--------|---|--|--|----------------------------|
| L 2 | A P P E A R A N C E S: CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO BY: MICHAEL A, INNES, ESQUIRE minnes@carellabyrne.com ZACHARY BOWER, ESQUIRE zbower@carellabyrne.com 5 Becker Farm Road Roseland, New Jersey 07068-1739 (973) 994-1700 Counsel for Plaintiffs | 1 | INDEX | |
| | BRODY & AGNELLO BY: MICHAEL A. INNES, ESOUIRE | 2 | ROXANNE REED PAGE | |
| | minnes@carellabyrne.com ZACHARY BOWER, ESOUIRE | 3 | DIRECT EXAMINATION BY MR. BOWER | 9 |
| | zbower@carellabyrne.com | 4 5 | EXHIBITS | |
| | Roseland, New Jersey 07068-1739 | 6 | No. Description PAGE Walmart- Roxanne Reed LinkedIn 11 | |
| | Counsel for Plaintiffs | 8 | Reed 1 profile | |
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| | BY: TARA A. FUMERTON, ESQUIRE tfumerton@jonesday.com | 10 | Walmart- January 2014 email chain. 69 | |
| | imcdonell@jonesday.com | 11 | Reed 3 Subj: The raw data along with questions. | |
| | tfumerton@jonesday.com JASON McDONELL, ESQUIRE imcdonell@jonesday.com 77 West Wacker Chicago, Illinois 60601-1692 312-782-1692 Counsel for Walmart | 12 | WMT MDL-000009635-9637. | |
| | 312-782-1692 Counsel for Walmart | 13 | Walmart- 1-30-14 email from 70 Reed 4 Aishwarya Shukla Subj: Methodology for flagging of | |
| | MARCUS & SHAPIRA, LLP (appearing telephonically) BY: DARLENE NOWAK, ESQUIRE dnowak@marcus-shapira.com 301 Grant Street 35th Floor Pittsburgh Pennsylvania 15219-6401 | 14 | store orders 30JAN. | |
| | (appearing telephonically) BY: DARLENE NOWAK, ESOUIRE | 15 | WMT MDL-000009629-9630 with attachment. | |
| | dnowak@marcus-shapira.com | 16 | Walmart- 11/3/14 email from Roxy 126 Reed 5 Reed to Maria Smith | |
| | 35th Floor Pittsburgh Pennsylvania 15219-6401 | 17 18 | WMT MDL 000048562-48598. Walmart- November 2014 email. Subj: 147 Reed 6 FW: Executive Summary for October Scorecard. | |
| | Pittsburgh, Pennsylvania 15219-6401 (412) 338-4690 Counsel for HBC | 19 | Reed 6 FW: Executive Summary for | |
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| | WRIGHT, LINDSEY & JENNINGS, LLP BY: CALEY B. VO, ESQUIRE | 21 | Walmart- 12-3-14 email from Miranda 154 | |
| | cyo@wlj.com 3333 Pinnacle Hills Parkway | 22 | Reed 7 Johnson to Roxy Reed. Subj: SOM - Archer. | |
| | Rogers, Arkansas 72758-8498 | 23 | WMT MDL-000009489-9491. Walmart- 12-4-18 email from Roxy 193 | |
| | Suite 510 Rogers, Arkansas 72758-8498 (479) 986-0888 Counsel for McKesson | 24 | Reed 8 Reed to Miranda Johnson Subj: | |
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| | BARBER LAW FIRM, LLP BY: J. CARTER FAIRLEY, ESQUIRE | 1 | Walmart- 12-23-14 email from Roxy Reed 9 Reed to Phyllis Harris. Subj: H&W Compliance Scorecard - November FY15 WMT MDL 000027994-27999. Walmart- Friday, August 21, 2015 Reed 10 Jabber communication between Kristy Spruell and | 20 |
| | cfairley@barberlawfirm.com 425 West Capitol Avenue | 2 | Subj: H&W Compliance Scorecard - November FY15 | |
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| | (501) 707-6182 Counsel for Cardinal Health, Inc. | 4 | Reed 10 Jabber communication between Kristy Spruell and | |
| | ARNOLD & PORTER KAYE SCHOLER, LLP | 5 | Royy Reed * * | |
| | | _ | W MII MIDL 000009033. | |
| | (appearing telephonically) | 6 | W MII MIDL 000009033. | |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com | 7 | W MII MIDL 000009033. | |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com | | W MII MIDL 000009033. | 220 |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com | 7 8 | WMT_MDL_00009033. Walmart- August 2015 email chain. Reed 11 Subj. RE: Email Notification of SOM Eval. WMT_MDL_000008688-8689. Walmart- 8-18-15 email from Roxy Reed 12 Reed. Subj: 6045 Threshold | 220 |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com 777 South Figueroa Street 44th Floor Los Angeles, California 90017-5844 (202) 942-5000 Coursel for Endo Health Solutions | 7 8 9 10 | WMT_MDL_00009033. Walmart- August 2015 email chain. Reed 11 Subj. RE: Email Notification of SOM Eval. WMT_MDL_000008688-8689. Walmart- 8-18-15 email from Roxy Reed 12 Reed. Subj: 6045 Threshold | 220 |
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| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com 777 South Figueroa Street 44th Floor Los Angeles, California 90017-5844 (202) 942-5000 Counsel for Endo Health Solutions Inc.; Endo Pharmaceuticals Inc.; Par Pharmaceuticals, Inc.; Par Pharmaceutical Companies, Inc. formerly known as Par Pharmaceutical Holdings, Inc. | 7 8 9 10 11 12 13 14 15 16 | WMT MDL 00009033. Walmart- August 2015 email chain. Reed II Subj. RE: Email Notification of 00008688-8689. WMT MDL 00008688-8689. Walmart- 8-18-15 email from Roxy Reed I2 Reed. Subj: 6045 Threshold WMT MDL 000053351-53352 with attachment. Walmart- July 2015 email chain Reed I3 Subj: RE: Project ID 28098- Wal-Mart - 62128 - Drug Tracking WMT MDL 000020529-20531. Walmart- 5-12-16 email chain. Subj: Reed I4 [Updated] SOM Eyal - Add CS schedule for Top 3 Docs" WMT MDL 00009030. | 2267 338 |
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| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com 777 South Figueroa Street 44th Floor Los Angeles, California 90017-5844 (202) 942-5000 Counsel for Endo Health Solutions Inc.; Endo Pharmaceuticals Inc.; Par Pharmaceuticals, Inc.; Par Pharmaceutical Companies, Inc. formerly known as Par Pharmaceutical Holdings, Inc. JACKSON KELLY, PLLC BY: ANGELA L. FREEL, ESQUIRE alfreel@jacksonkelly.com 221 NW Fifth Street Evansville, IN 47708 (812)442,9444 Counsel for AmerisourceBergen ALSO PRESENT: Paul D. Morris | 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | WMT MDL 00009033. Walmart- August 2015 email chain. Reed II Subj. RE: Email Notification of 00008688-8689. WMT MDL 00008688-8689. Walmart- 8-18-15 email from Roxy Reed I2 Reed. Subj: 6045 Threshold WMT MDL 000053351-53352 with attachment. Walmart- July 2015 email chain Reed I3 Subj: RE: Project ID 28098- Wal-Mart - 62128 - Drug Tracking WMT MDL 000020529-20531. Walmart- 5-12-16 email chain. Subj: Reed I4 [Updated] SOM Eyal - Add CS schedule for Top 3 Docs" WMT MDL 00009030. | 2267 338 |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com 777 South Figueroa Street 44th Floor Los Angeles, California 90017-5844 (202) 942-5000 Counsel for Endo Health Solutions Inc.; Endo Pharmaceuticals Inc.; Par Pharmaceuticals, Inc.; Par Pharmaceutical Companies, Inc. formerly known as Par Pharmaceutical Holdings, Inc. JACKSON KELLY, PLLC BY: ANGELA L. FREEL, ESQUIRE alfreel@jacksonkelly.com 221 NW Fifth Street Evansville, IN 47708 (812)442.9444 Counsel for AmerisourceBergen ALSO PRESENT: Paul D. Morris Senior Associate Counsel Walmart, Inc. | 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | WMT MDL 00009033. Walmart- August 2015 email chain. Reed II Subj. RE: Email Notification of 00008688-8689. WMT MDL 00008688-8689. Walmart- 8-18-15 email from Roxy Reed I2 Reed. Subj: 6045 Threshold WMT MDL 000053351-53352 with attachment. Walmart- July 2015 email chain Reed I3 Subj: RE: Project ID 28098- Wal-Mart - 62128 - Drug Tracking WMT MDL 000020529-20531. Walmart- 5-12-16 email chain. Subj: Reed I4 [Updated] SOM Eyal - Add CS schedule for Top 3 Docs" WMT MDL 00009030. | 226 25 267 338 |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com 777 South Figueroa Street 44th Floor Los Angeles, California 90017-5844 (202) 942-5000 Counsel for Endo Health Solutions Inc.; Endo Pharmaceuticals Inc.; Par Pharmaceuticals, Inc.; Par Pharmaceutical Companies, Inc. formerly known as Par Pharmaceutical Holdings, Inc. JACKSON KELLY, PLLC BY: ANGELA L. FREEL, ESQUIRE alfreel@jacksonkelly.com 221 NW Fifth Street Evansville, IN 47708 (812)442.9444 Counsel for AmerisourceBergen ALSO PRESENT: Paul D. Morris Senior Associate Counsel Walmart, Inc. THE VIDEOGRAPHER: | 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | Will MDL 000009033. Walmart - August 2015 email chain. Reed II Subj. RE: Email Notification of SOM Eyal WMT MDL 000008688-8689. Walmart - 8-18-15 email from Roxy Reed I2 Reed. Subj: 6045 Threshold WMT MDL 000053351-53352 with attachment. Walmart - July 2015 email chain Reed I3 Subj. RE: Project ID 28098- Wal-Mart - 62128 - Drug Tracking WMT MDL 000020529-20531. Walmart - 5-12-16 email chain. Subj. Reed I4 [Updated] "SOM Eyal - Add CS schedule for Top 3 Docs" WMT MDL 000009030. Walmart - June 2016 email chain. Reed I5 Subj. FW: SOM Cloud Data Document - Current Version ver. I.3 5-12-16 email chain. Subj. [Updated] "SOM Eyal - Add CS schedule for Top 3 Docs" WMT MDL 000009030.04624- 4626. | 2267 253 338 3343 |
| | (appearing telephonically) BY: JAKE MILLER, ESQUIRE jake.miller@arnoldporter.com 777 South Figueroa Street 44th Floor Los Angeles, California 90017-5844 (202) 942-5000 Counsel for Endo Health Solutions Inc.; Endo Pharmaceuticals Inc.; Par Pharmaceuticals, Inc.; Par Pharmaceutical Companies, Inc. formerly known as Par Pharmaceutical Holdings, Inc. JACKSON KELLY, PLLC BY: ANGELA L. FREEL, ESQUIRE alfreel@jacksonkelly.com 221 NW Fifth Street Evansville, IN 47708 (812)442.9444 Counsel for AmerisourceBergen ALSO PRESENT: Paul D. Morris Senior Associate Counsel Walmart, Inc. | 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | WMT MDL 00009033. Walmart- August 2015 email chain. Reed II Subj. RE: Email Notification of 00008688-8689. WMT MDL 00008688-8689. Walmart- 8-18-15 email from Roxy Reed I2 Reed. Subj: 6045 Threshold WMT MDL 000053351-53352 with attachment. Walmart- July 2015 email chain Reed I3 Subj: RE: Project ID 28098- Wal-Mart - 62128 - Drug Tracking WMT MDL 000020529-20531. Walmart- 5-12-16 email chain. Subj: Reed I4 [Updated] SOM Eyal - Add CS schedule for Top 3 Docs" WMT MDL 00009030. | 226 25 267 338 |

| Walmart December 2017 email chain. 368 Reed 17 Subj: RE: Follow-up Marked 17 Subj: RE: Follow-up Marked 17 Subj: RE: Stores 1509, 81-509 Marked 18 Ponis & FAQS Updated Jan. 5. WIT JMD. 400007300-7354. | | 5 1 | | 4 |
|--|--|--|----------------------------------|---|
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| Order Reports Walmart October 2015 email chain. Reed 20 Subj. RE: Stores Needing WMT_MDL_000008865-8866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMR_MOLTOMIC October 2015 email chain. Reed 20 Subj. RE: Stores Needing WMT_MDL_000028865-28866. WMT_MDL_000028865-28866. WMR_MOLTOMIC October 2015 email chain. Reed 20 Subj. RE: Stores Needing WMT_MDL_000028865-28866. WMR_MOLTOMIC October 2015 email chain. Reed 20 Subj. RE: Stores Needing WMT_MDL_000028865-28866. WMR_MOLTOMIC October 2015 email chain. Reed 20 Subj. RE: Stores Needing WMT_MDL_000028865-28866. WMR_MOLTOMIC Need 15 Subj. MR. BOWER: Zach Bower, also Carella Byrne, on behalf of plaintiffs in the MDL. THE VIDEOGRAPHER: Will the court reporter please swear in the witness. (Telephonic interruption.) THE VIDEOGRAPHER: Anyone on the phone remotely, please identify yourselves for the record as well. MR. MILLER: Hi. This is Jake Miller from Arnold & Porter on behalf of the Endo and Par defendants. Page 7 PROCEEDINGS (January 10, 2019 at 8:08 a.m.) THE VIDEOGRAPHER: We are now on the record. My name is CJanuary 10, 2019 at 8:08 a.m.) THE VIDEOGRAPHER: Manual Porter on behalf of the Endo and Par defendants. Page 9 MS. FREEL: Hi, this is Darlene Nowak for Marcus & Shapira, on behalf of Malmart and the witness. MR. FURLER: Hi. This is Darlene Nowak for Marcus & Shapira, on behalf of Malmart and the witness. Rocall Innex. Carella Byrne, on behalf of plaintiffs in the MDL. MR. BOWER: MR. BOWER: MR. BOWER: MR. BOWER: MR. FURLER: Hi. This is Dake Miller from Arnold & Porter on behalf of the Endo and Par defendants. Page 9 MS. FREEL: Hi, this is Darlene Nowak for Marcus & Shapira, on behalf of Malmart and the witness. Darlene Nowak for Marcus & Shapira, on behalf of Malmart and the witness. Darlene Nowak for Marcus & Shapira, on behalf of Malmart and the witness | 6 | Walmart- January 2018 email chain. 382 Reed 19 Subi: Re: EXT: Suspicious | 7 | MR. VO: Caley Vo, Wright |
| Walmart October 2015 email chain. Reed 20 Suby. RE: Stores Needing Threshold Evaluation. WMT_MDI_000028865-28866. 10 WAR. INNES: Michael Innes, Carella Byrne, on behalf of plaintiffs in the MDL. 13 WAR. Double 20 WMT_MDI_000046435-46441. 14 WMT_MDI_000046435-46441. 15 WMT_MDI_000046435-46441. 16 WMT_MDI_000046435-46441. 16 WMT_MDI_000046435-46441. 17 WMT_MDI_000046435-46441. 16 WMT_MDI_000046435-46441. 17 WMT_MDI_000046435-46441. 18 WMT_MDI_000046435-46441. | | Order Reports. | 8 | Lindsey & Jennings, on behalf of |
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Page 10 1 First, and perhaps most O. ¹ certainly review those as we go throughout important, is if I ask a question and you the day. I don't have any questions on them 3 right now. I just wanted you to have them in don't understand it, please let me know. case you need to refer to them. Okay? 4 Okay? 5 5 A. Okay. A. Okay. 6 6 Okay. So if you don't So I just want to start this Q. Q. morning with a bit of your background. understand the question, I will try to 8 rephrase it so that we can both be on the A. Okay. 9 9 same page. Okay? Q. And kind of your earlier years 10 10 at Walmart. A. Okay. 11 11 Q. If you do not let me know that MS. FUMERTON: And, Zach, just 12 12 you don't understand a question, I will to make sure, this is going to be 13 assume that you do understand the question. 13 Exhibit 1? 14 Do you understand that? 14 MR. BOWER: Yeah, sorry. 15 15 Yes. That's important for the record. A. 16 16 Thank you. Also very important, if a O. 17 17 question calls or an answer calls for a "yes" I believe that Exhibit 1 is 18 18 or "no," please provide a verbal answer and your LinkedIn profile. And Exhibit 2 19 19 will be your performance review. don't shake your head. That way, the court 20 20 THE WITNESS: Okay. reporter can take down your answer. Okay? 21 21 A. MR. BOWER: Okay? Okay. 22 22 Q. Any questions you have before Thank you for that, Tara. 23 23 we begin? MS. FUMERTON: And so you don't 24 24 want her to take time to review this A. No. 25 25 O. Is there any reason or anything now. We'll just have it. Page 11 Page 13 that would prevent you from testifying 1 MR. BOWER: She can review it 2 as questions come up. I just want her truthfully today? 3 3 A. No. to have it there. If she needs to O. And if you want to take a break 4 refer to it, certainly do. But at any time, please let us know and we'll do 5 there's no reason to review it at the so. I just ask that you would answer any 6 moment. 7 7 question that's pending. MS. FUMERTON: Okay. Can I 8 8 Do you understand that? just at least let her, then, flip 9 Okay. 9 through the review just to see what's A. 10 So when we get started, I'm 10 in it? Q. 11 going to give you a couple of documents to MR. BOWER: Sure. kind of get us started, which is going to be 12 MS. FUMERTON: I'm not sure she your annual performance review. So that will 13 would understand -- this would even be 14 help us kind of frame our discussion. 14 helpful for a question. 15 15 (Walmart-Reed Deposition 16 Exhibit 1 was marked for 17 identification.) 18 Q. (BY MR. BOWER) I don't want 19 this to be a guessing game here. And also 20 I'm going to give you your LinkedIn profile. 21 Okay. Okay. Yes, so why don't you 22 (Walmart-Reed Deposition 22 23 Exhibit 2 was marked for flip through it and just familiarize yourself 24 with it, and then we'll start at least identification.)

(BY MR. BOWER) And you can

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briefly on kind of your early days at

Page 14 Page 16 Walmart. A. Yes. 2 Okay. And I'm referring to A. Okay. O. 3 Okay. Thanks. And certainly Exhibit 1, which is your LinkedIn profile. O. if I ask specific questions on this or you Mm-hmm. (Witness nods.) 5 need to refer to it throughout the day, During that -- strike that. O. 6 In that position, did you have please do so --7 any involvement in Walmart's suspicious order A. Okav. 8 -- okay? monitoring? O. 9 9 So can you just describe A. No. briefly for us your -- any education that you 10 Did you have any involvement in 10 O. 11 received after high school? 11 the distribution of Schedule II narcotics? 12 12 Yes. I went to Arkansas Tech No. A. University. I have a major in chemistry and 13 13 O. And then, what did you --14 a minor in biology. 14 MR. MILLER: I'm sorry, I Okay. And then what did you do 15 apologize. On the phone, I don't know 15 O. immediately after graduating from 16 if others can hear, but I can hear 17 17 Arkansas Tech? almost nothing. 18 18 MS. NOWAK: Same here. A. I worked for a water filtration 19 company. And then a liquor store part time. 19 MR. BOWER: All right. Well, 20 Okay. And then you graduated 20 why don't we go off the record for a in approximately 2006; is that correct? 21 moment and we'll try to rearrange the 21 22 22 A. Yes. December 2006. phone. 23 23 Okay. And then in 2007, you THE VIDEOGRAPHER: 8:15. We 24 began working at Walmart; is that correct? are off the video record. 25 25 A. Yes. (Recess taken, 8:16 a.m. to Page 15 1 Q. And what was your first job at 8:16 a.m.) 2 2 Walmart? 3 3 A. It was an optical contract are on video record. 4 coordinator. Q. (BY MR. BOWER) All right. 5 Let's continue where we left off, then.

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O. And then what was your next job at Walmart?

It was an audit manager with health and wellness compliance.

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- Can you just describe briefly O. what that means?
- Yes. We audited health and wellness compliance programs, things like our partial bill program and Medicaid tamper-resistant prescriptions.
- And that was from approximately October 2008 to April 2010?

Page 17

THE VIDEOGRAPHER: 8:17. We

After your position as a health and wellness audit manager, what was your next position at Walmart?

- It was a systems manager in health and wellness compliance.
- And what -- how did your duties and responsibilities change with that change in title?
- I started focusing more on data and analytics, and system-related things, databases, queries, that kind of thing.

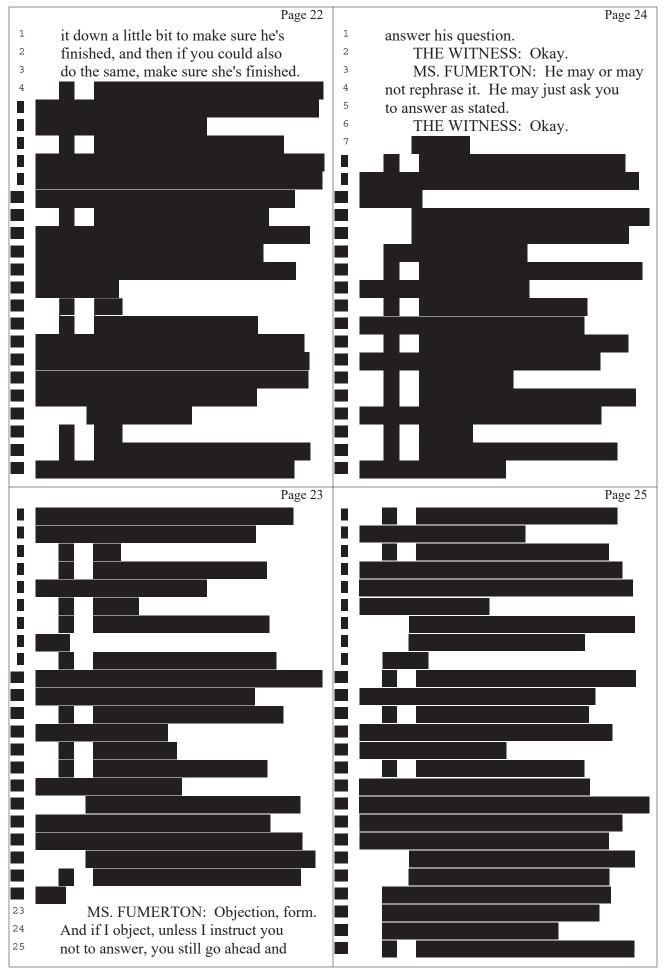
Oh, I guess technically the next position was a compliance analyst. Sorry, I skipped a position.

Q. That's fine. That's why I wanted to supply this, to kind of make sure we get it right.

A. Yes.

So the compliance analyst O. position was before the systems manager; is



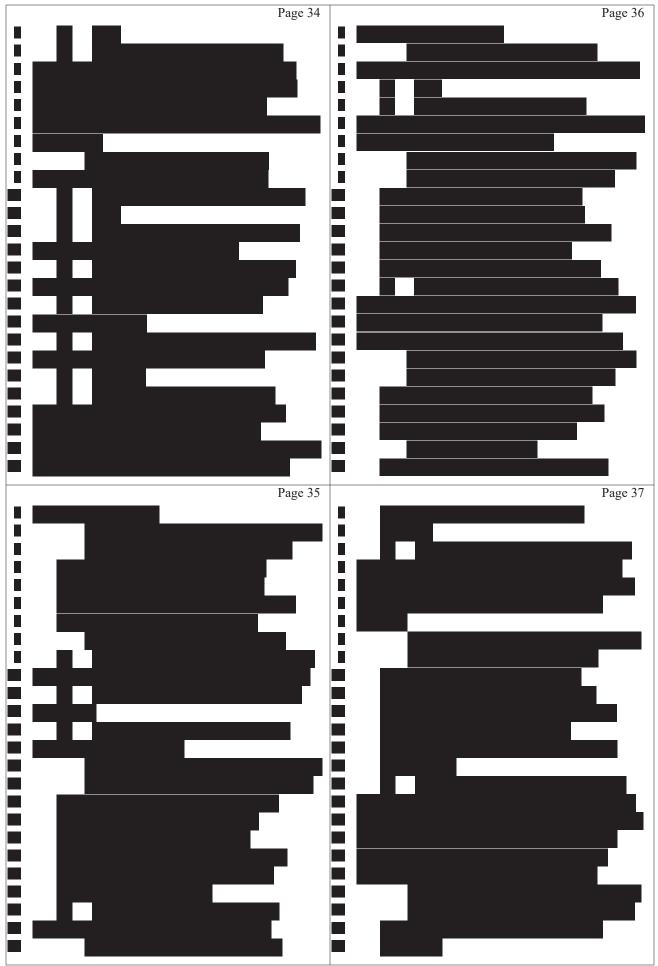




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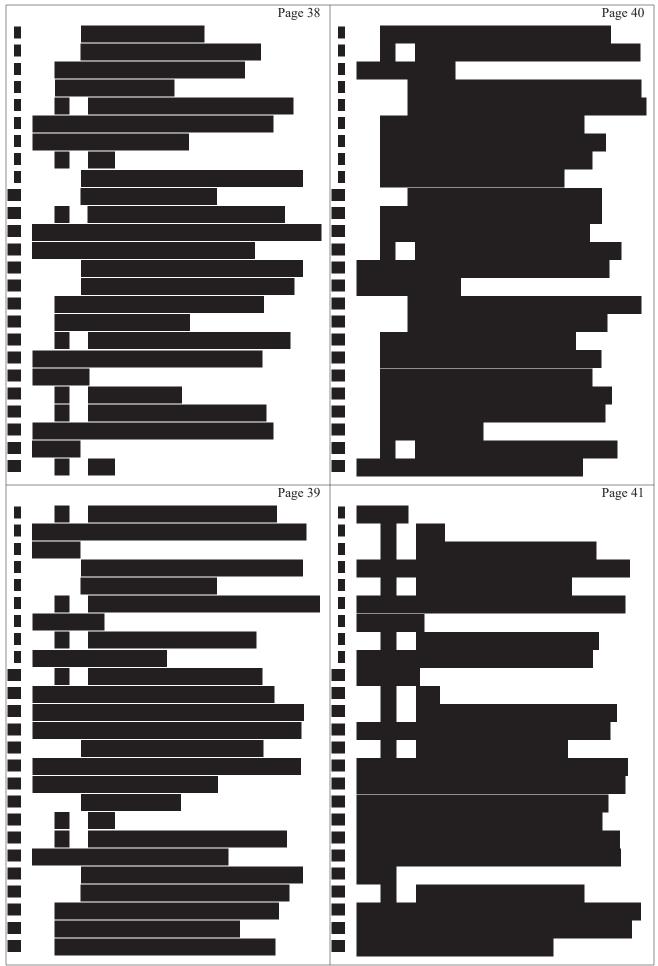
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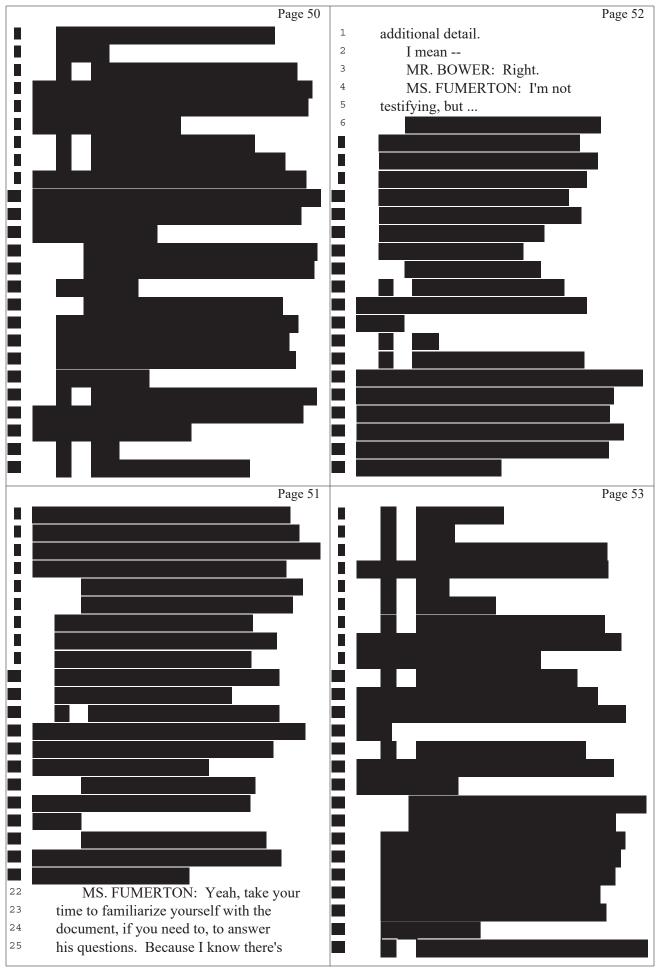






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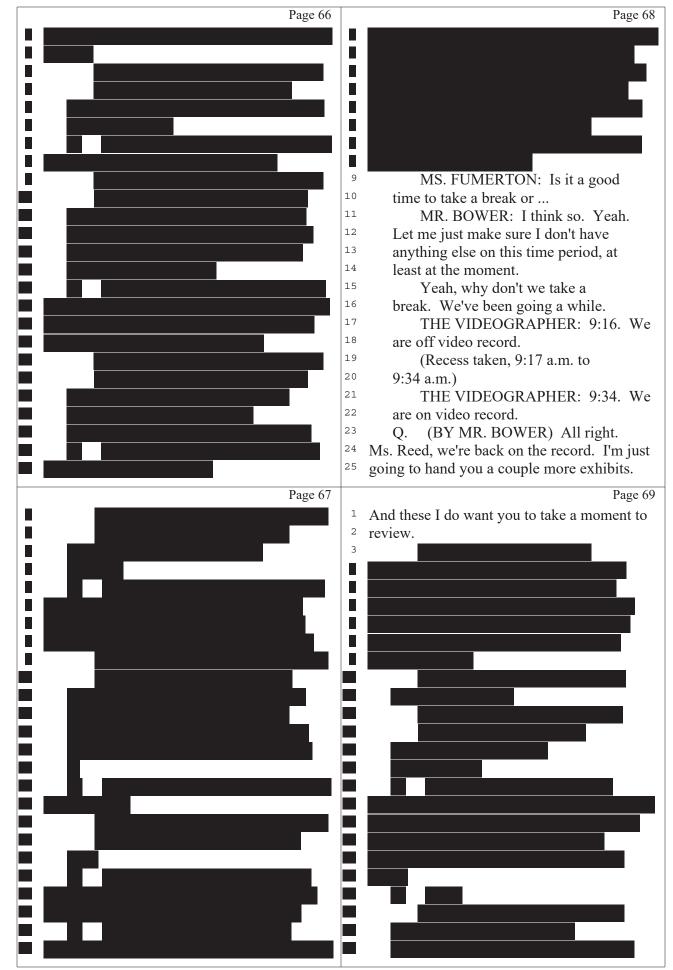


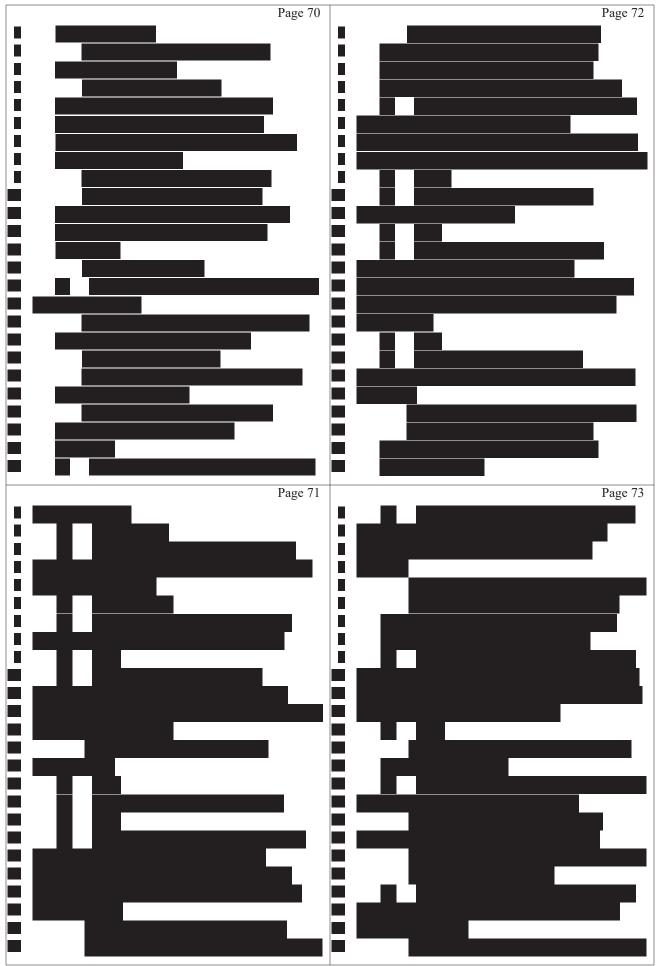
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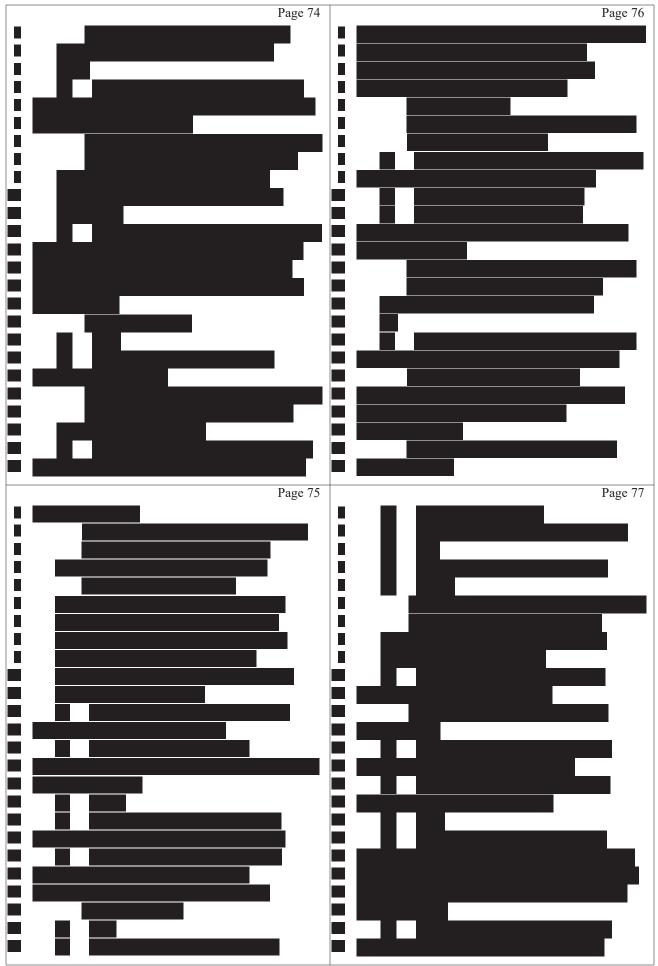
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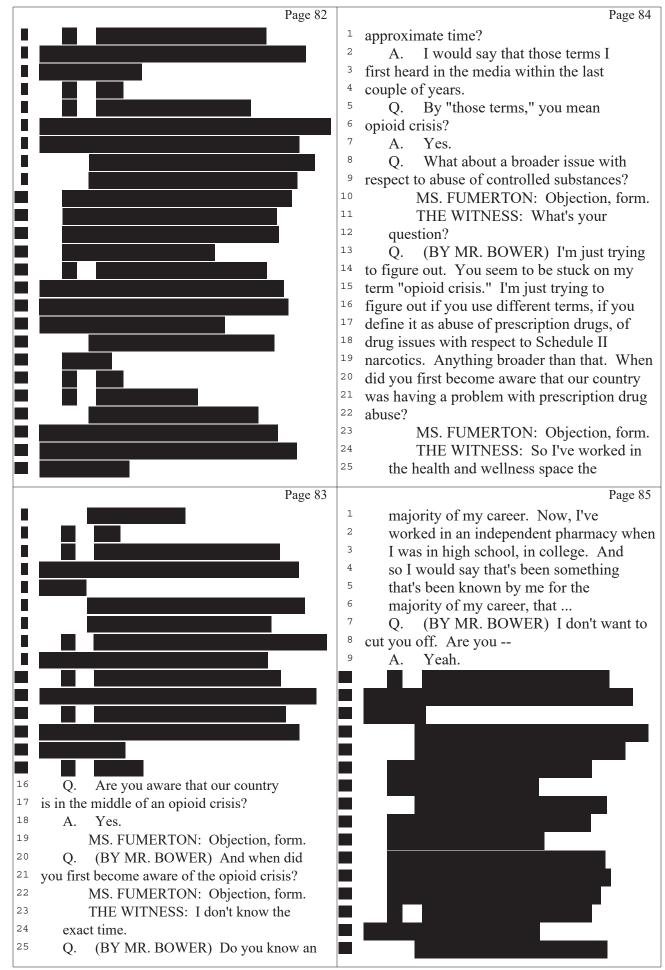
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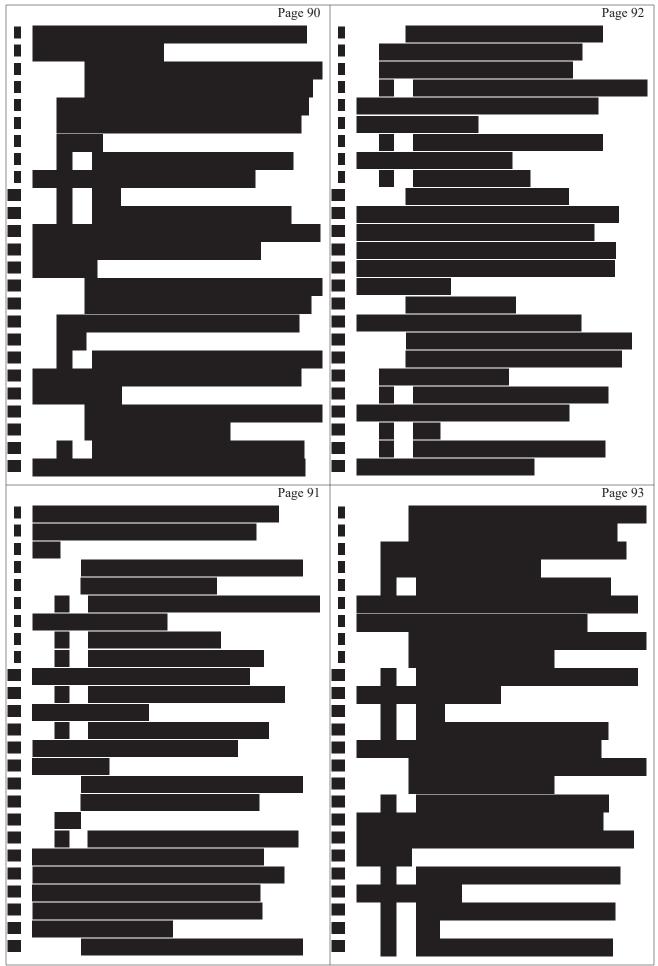
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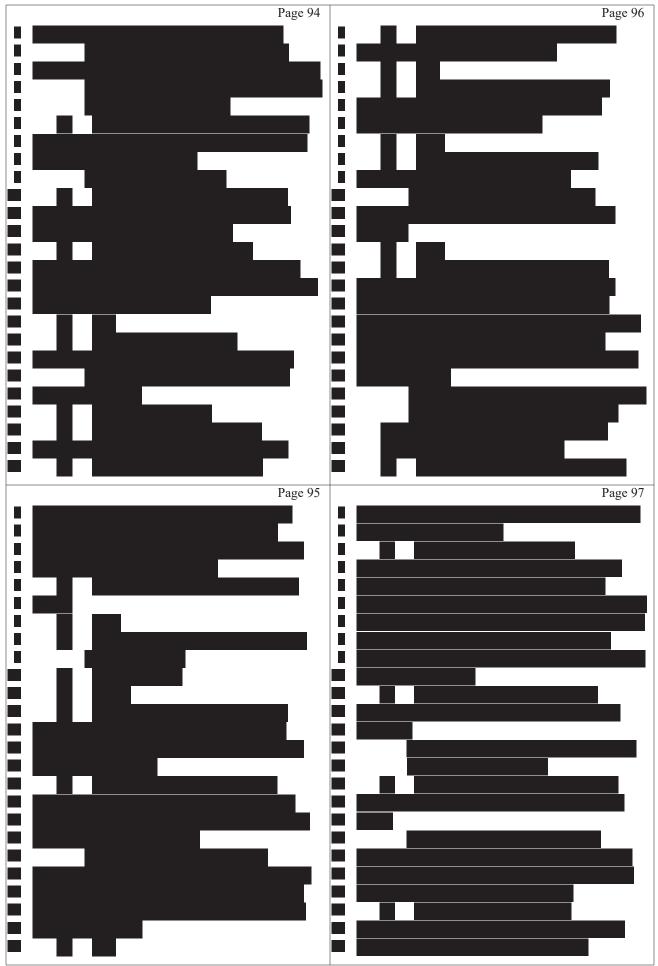
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(BY MR. BOWER) Do you have any understanding, other than what you've just told us, what this case is about?

MS. FUMERTON: Again, the witness can answer to the extent that she can do so without revealing any communications with counsel, but otherwise I instruct her not to answer that question.

THE WITNESS: The only way I know is because of counsel.

- Q. (BY MR. BOWER) Okay. So other than in communications with counsel, you didn't do anything else to educate yourself as to why Walmart is involved in this case; is that correct?
- A. Correct.

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- You haven't reviewed the O. complaint, for example?
- 20 No, I have not reviewed the 21 complaint.
- 22 O. You're not familiar with the 23 allegations that are being made against Walmart; is that correct?

MS. FUMERTON: Again, in the

- some other documents that were produced to us in this case. Okay?
 - A. Okav.
- 4 O. Has anyone ever asked you whether you might have documents to produce to us that might relate to the allegations in this case?

MS. FUMERTON: Again, objection to the form of the question.

If the question is has anybody asked her to -- whether or not she has documents -- my objection is to the "allegations in this case" portion of the question. If you could rephrase. And I'm not trying to be difficult. I'm just trying to be helpful to get you the information you want without getting into any privileged information.

- (BY MR. BOWER) Do you understand the question?
- 22 Α. The basic form of the question, 23 I think so, yes.
 - Okay. I'm just trying to get at whether anyone said, hey, Roxy, do you

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context, outside of communications with counsel, you can answer that.

If you have such knowledge, you can answer that question, but it's not directed based, I think, on his earlier ones, on our communications.

I know, it's a tricky --

THE WITNESS: I think the answer is still no.

MR. BOWER: Okay.

Q. (BY MR. BOWER) And have you ever been asked whether you have documents that may be responsive to the allegations in this case?

MS. FUMERTON: Objection, form. And to the extent -- objection, form. If you can understand and answer his question, you can answer "yes" or "no."

THE WITNESS: Can you rephrase the question? Try it that way?

(BY MR. BOWER) Sure. And let me do it this way.

We'll see today some documents, some emails from you to others in Walmart and 25 Page 105

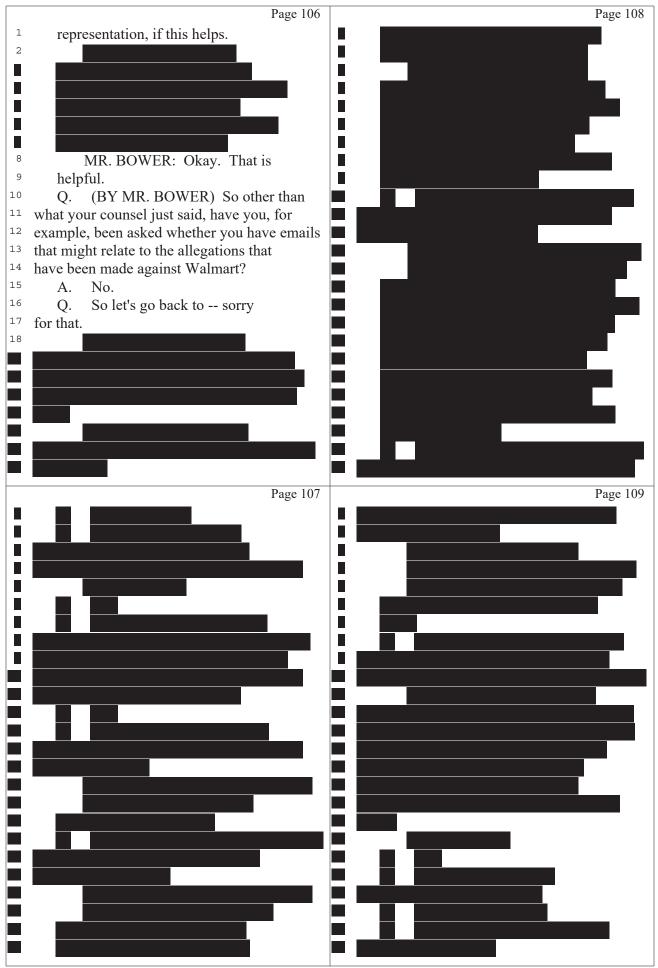
- have -- we've been sued in this case. Do you have anything that might be relevant to the case?
 - Anyone ever talk to you about

that?

- With that wording, no. A.
- What about with any wording O. similar to that?
 - Similar to that, no. Α.
 - What about in any capacity? O.

I mean, I'm not trying to play games here. I'm just trying to figure out -we've made certain document requests to Walmart. Right? Certain documents were produced. I'm just wondering whether anyone ever came to you and said, "Hey, do you have anything that we might need to produce in connection with this opioid case?"

MS. FUMERTON: Okay. So I think she's answered that question, and I think this is getting into complicated attorney -- potentially attorney-client privileged information that may be difficult for her to navigate on her own. I can make this



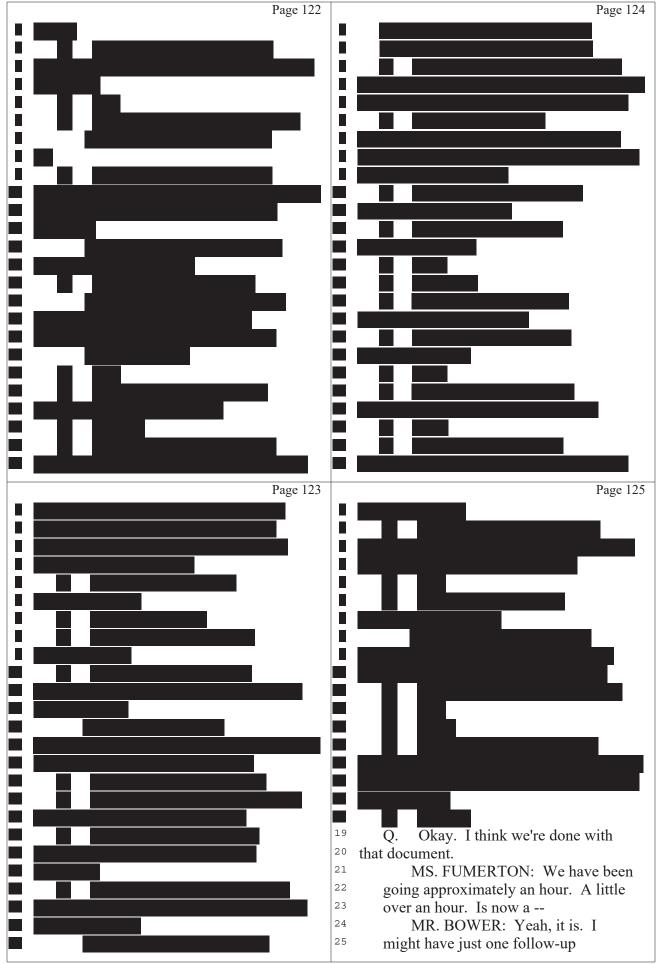


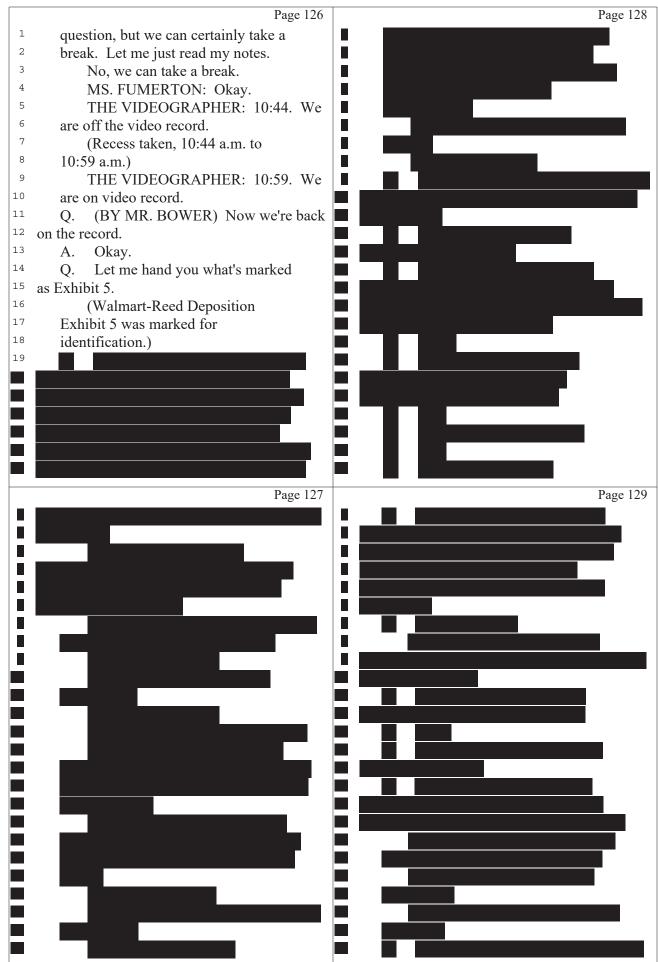




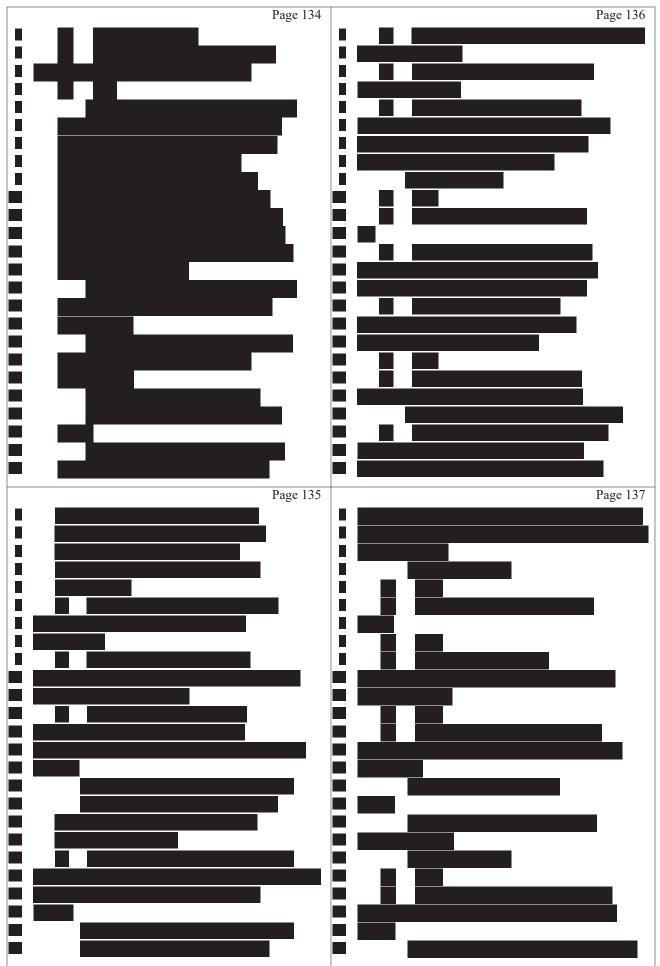
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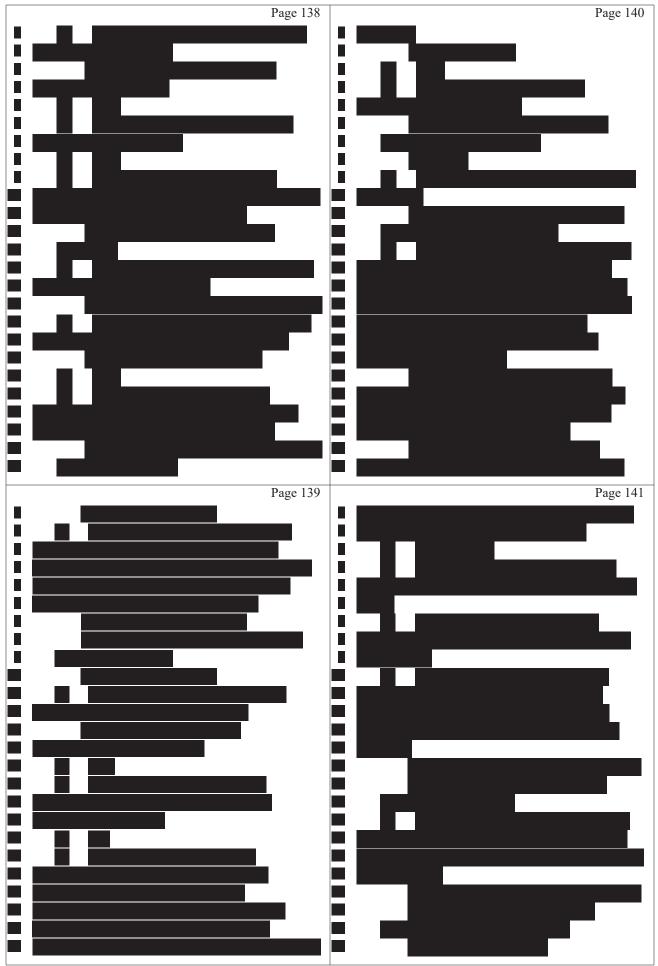
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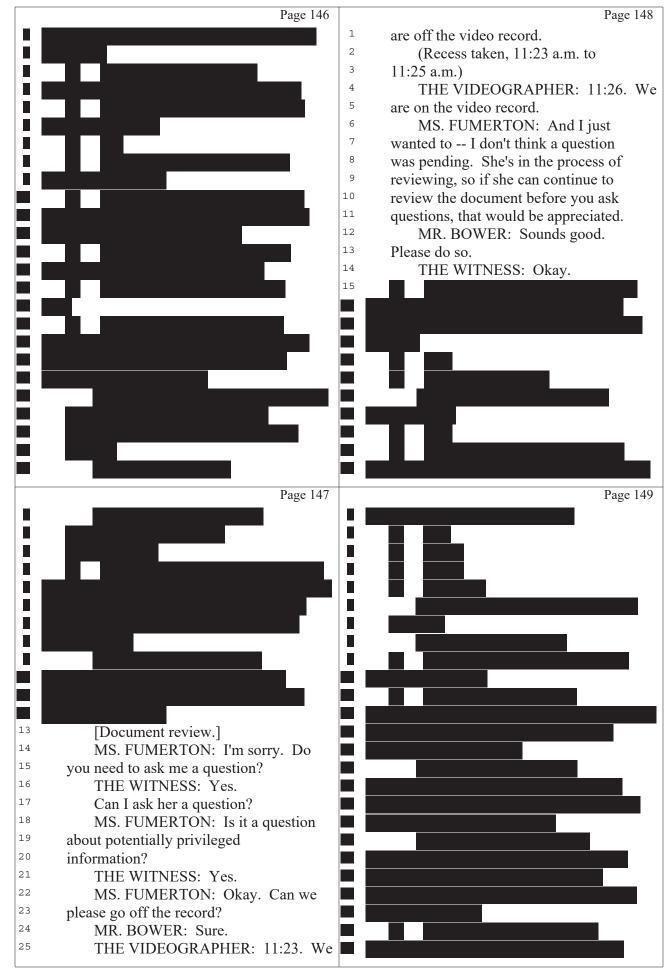
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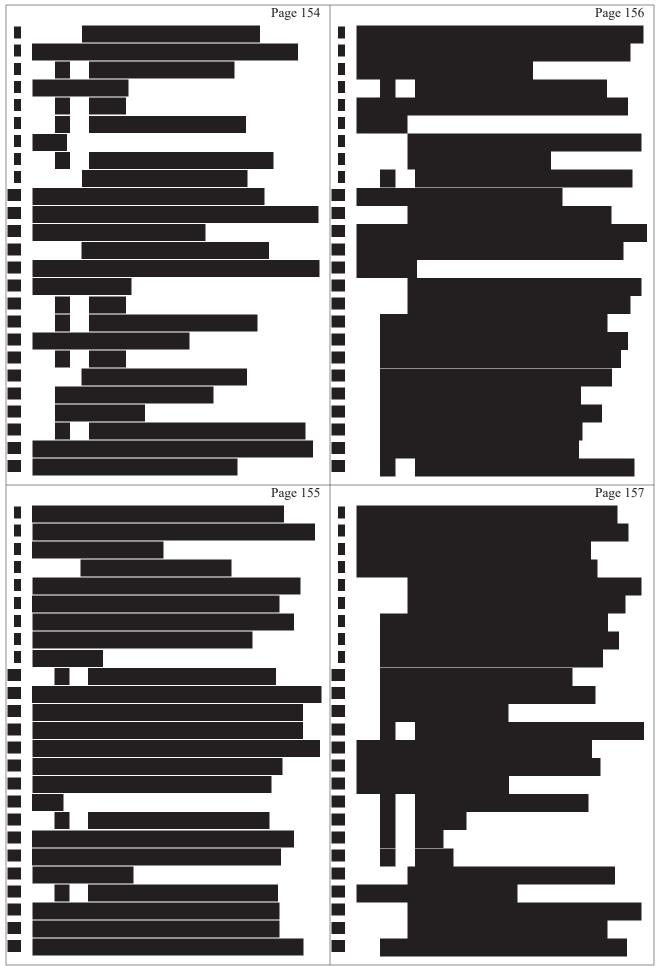


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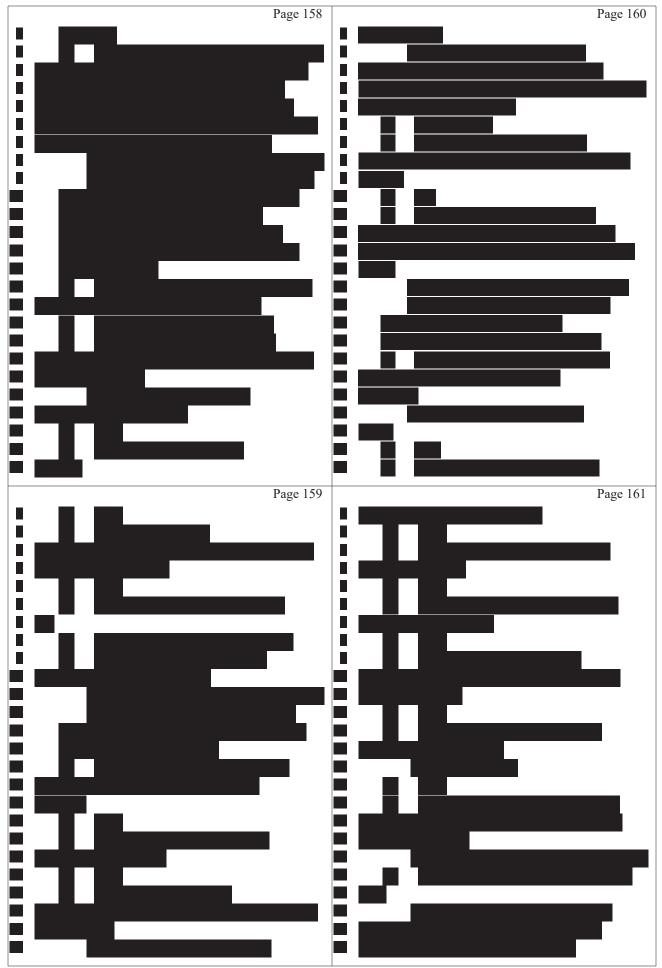






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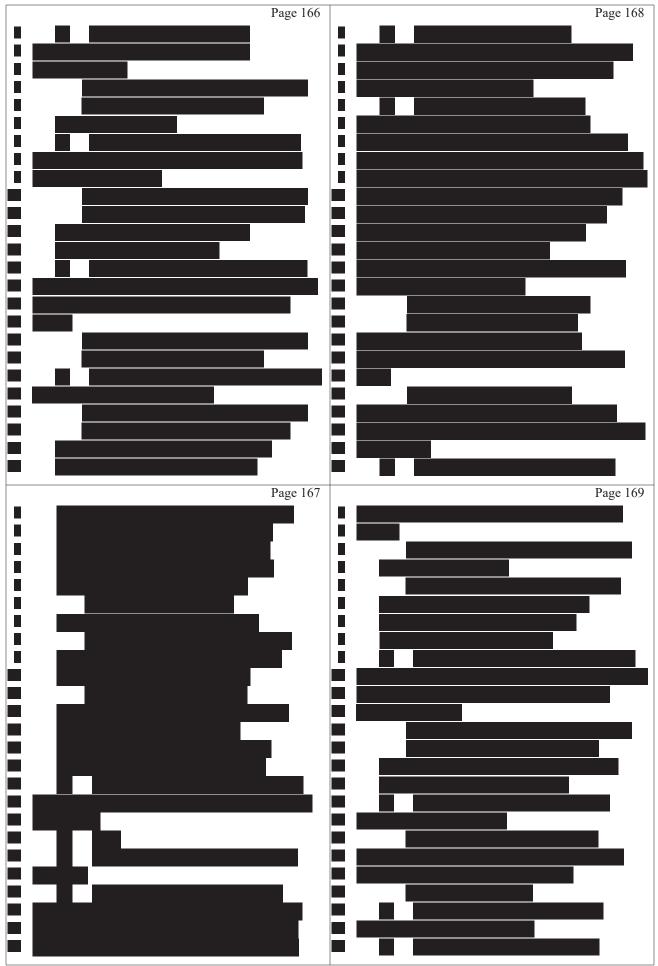
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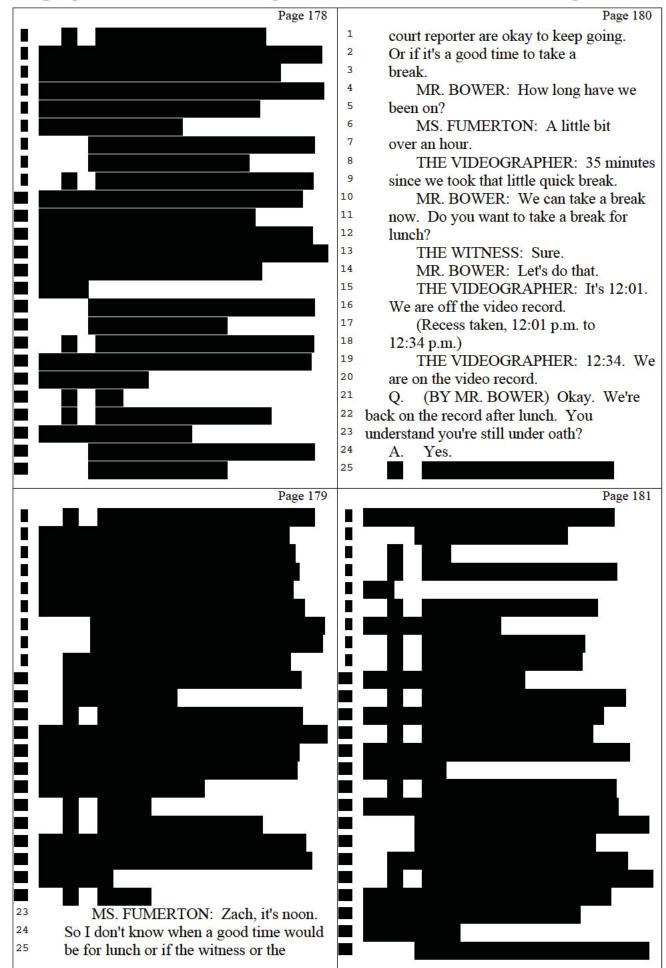
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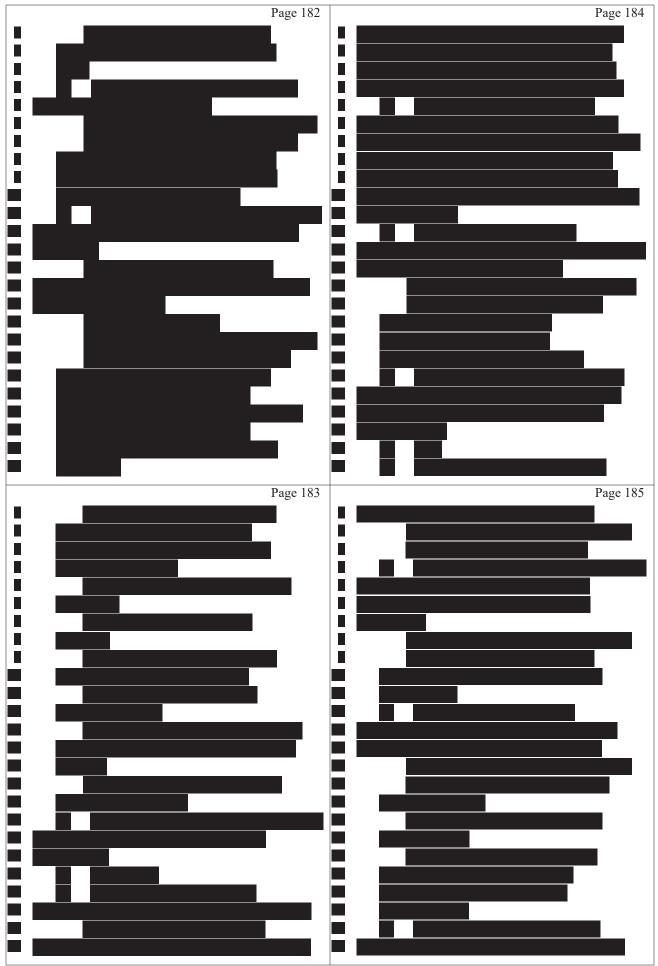
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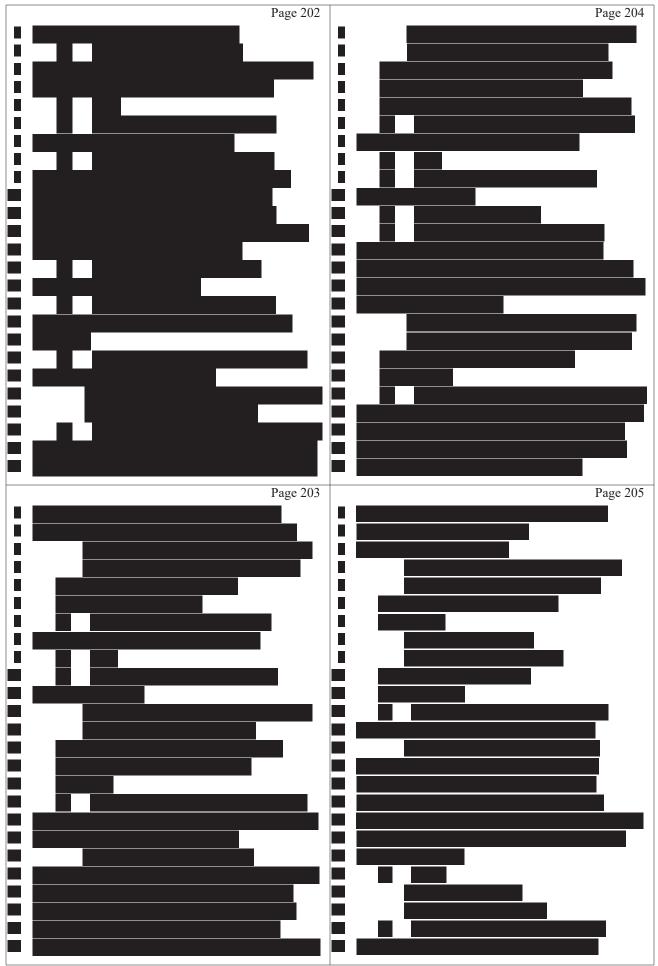
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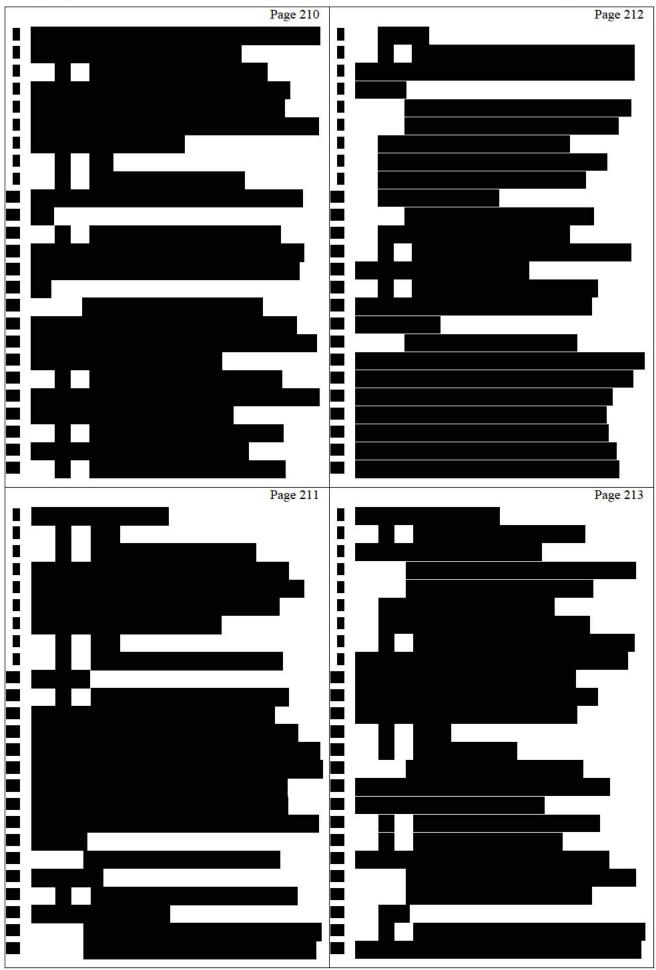
Page 51 (198 - 201)





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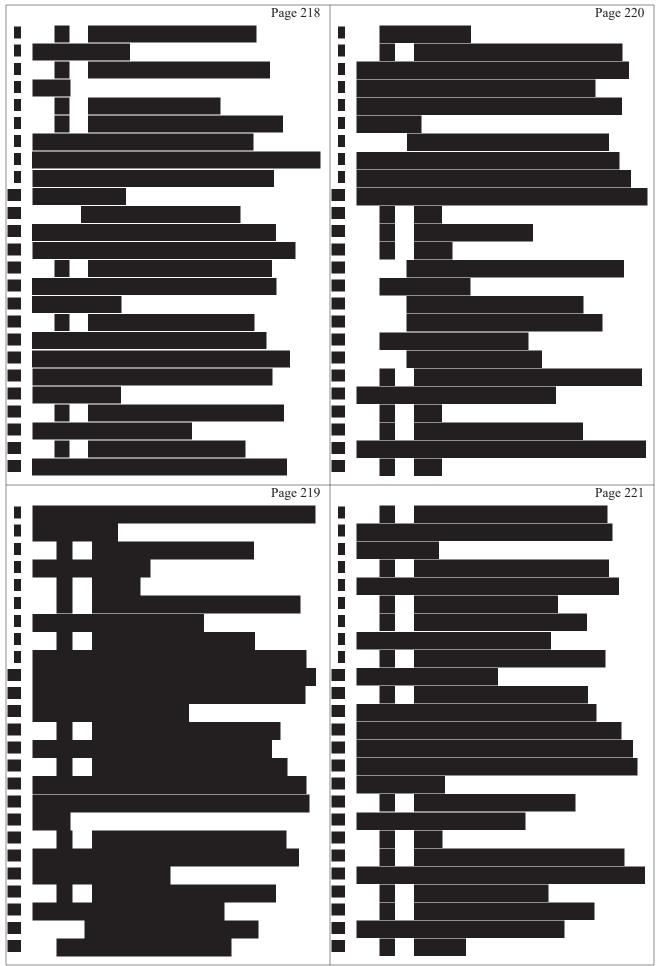
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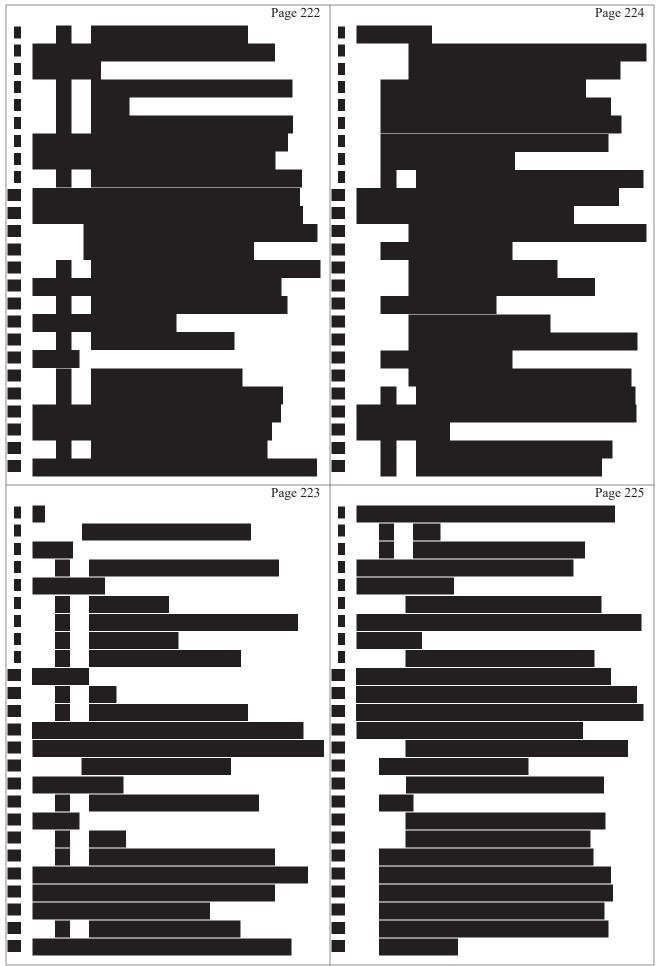


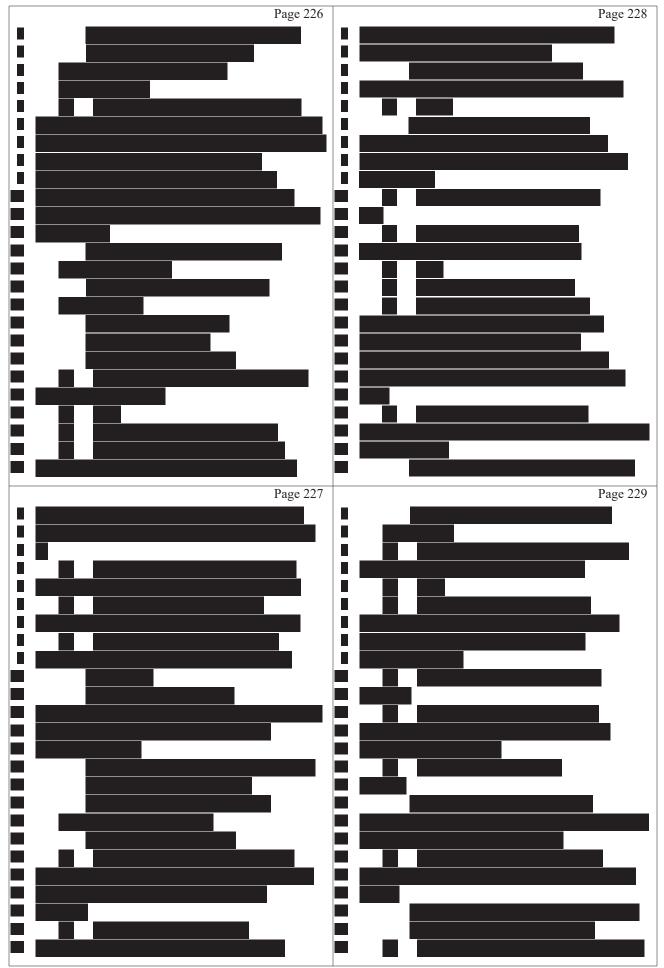


Golkow Litigation Services

Page 55 (214 - 217)

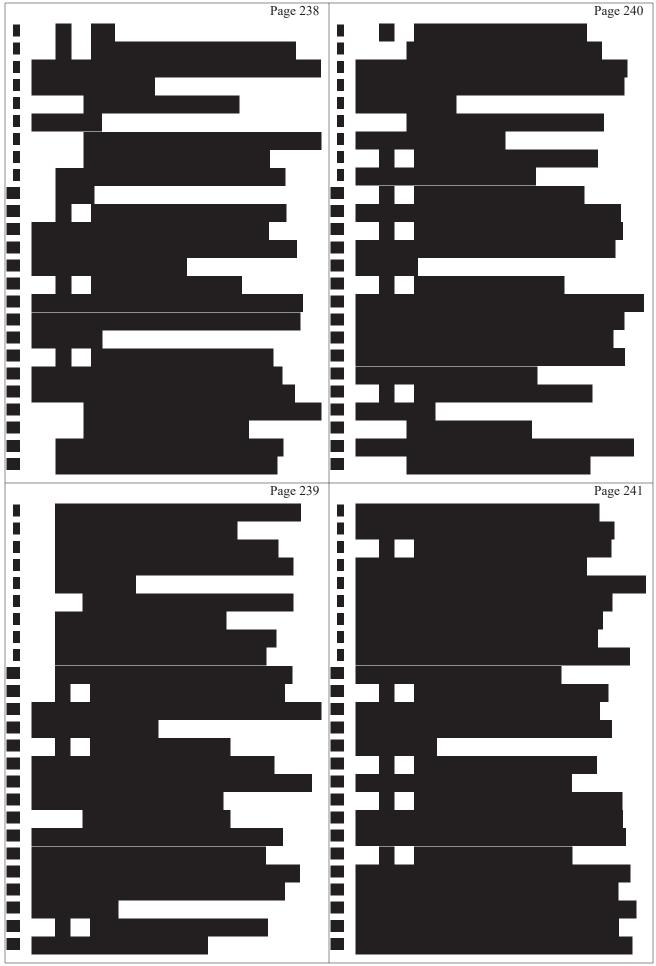








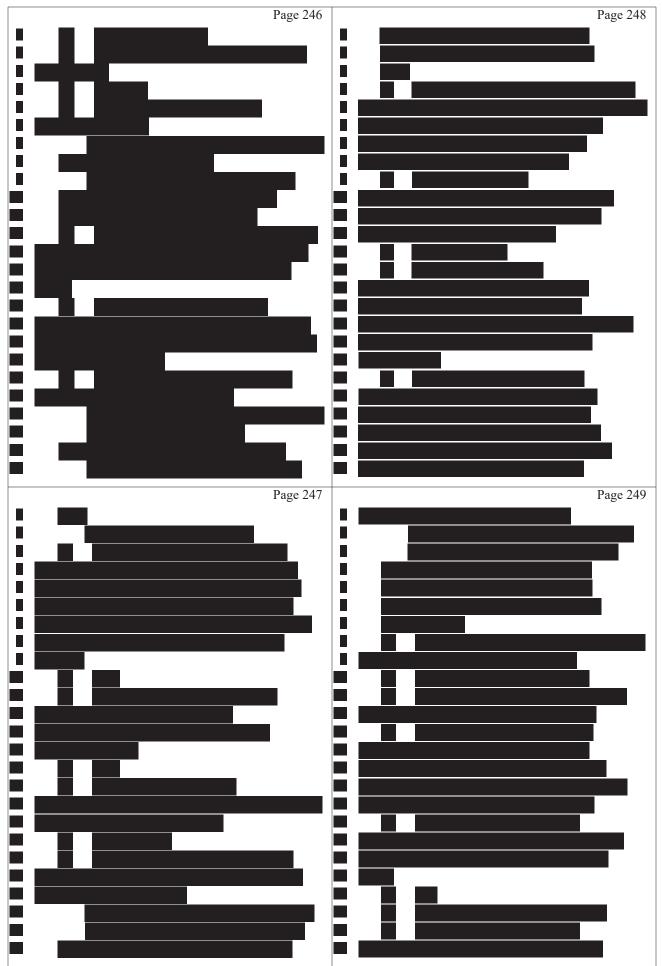


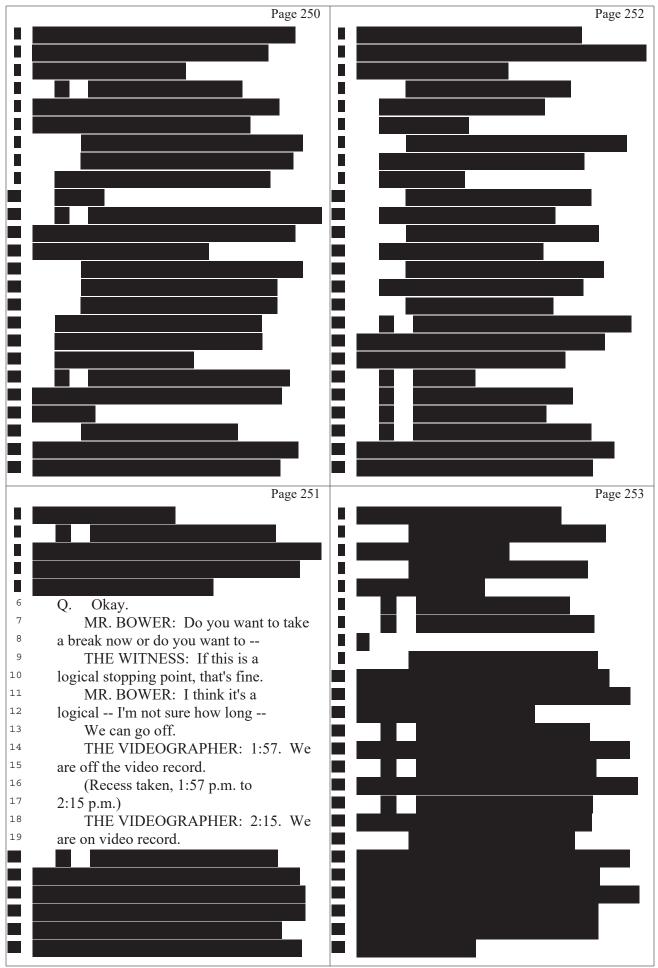


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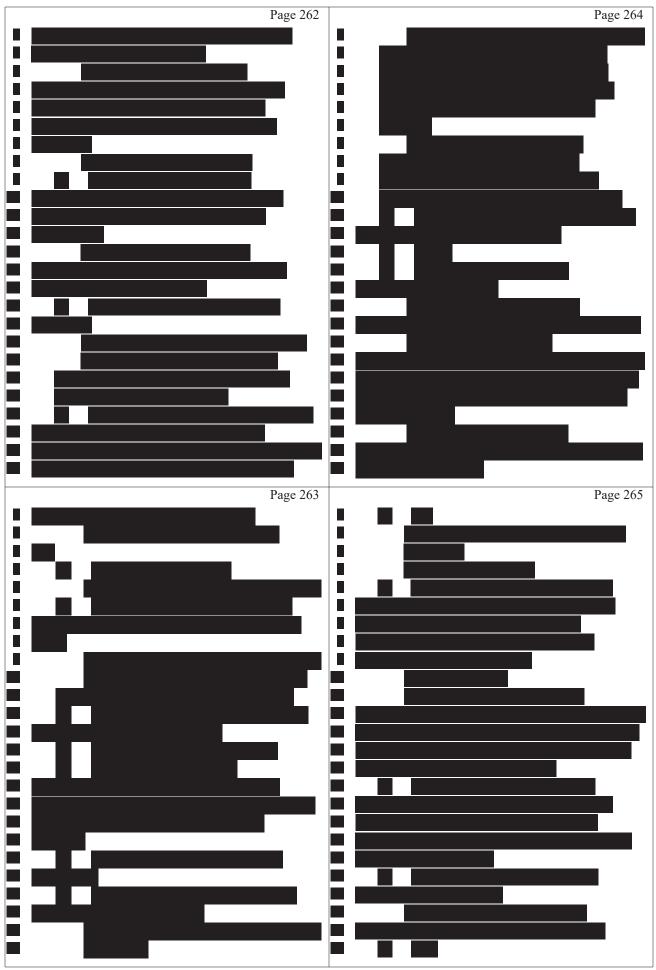


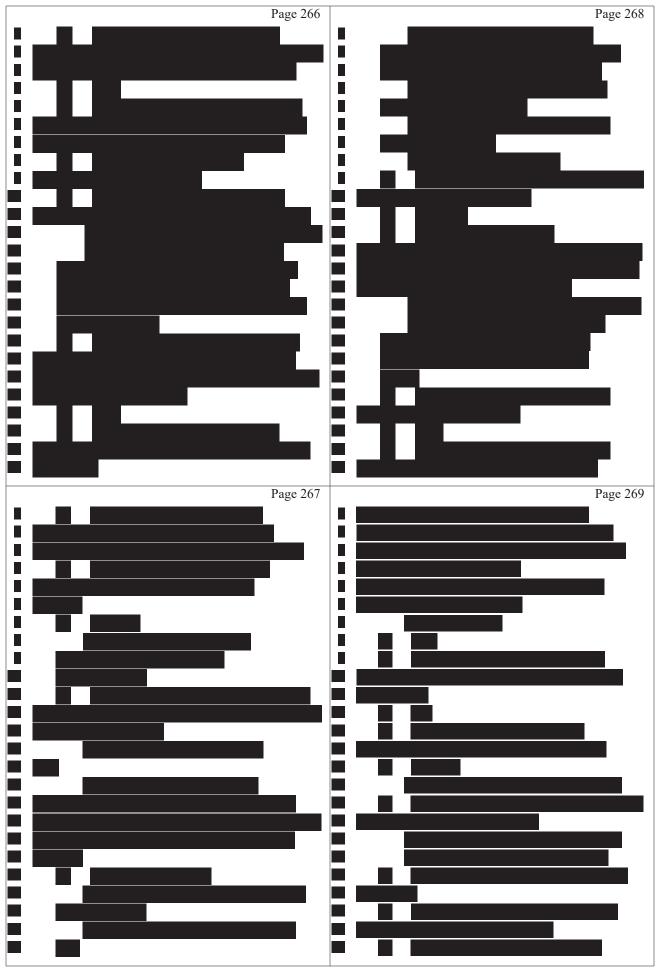


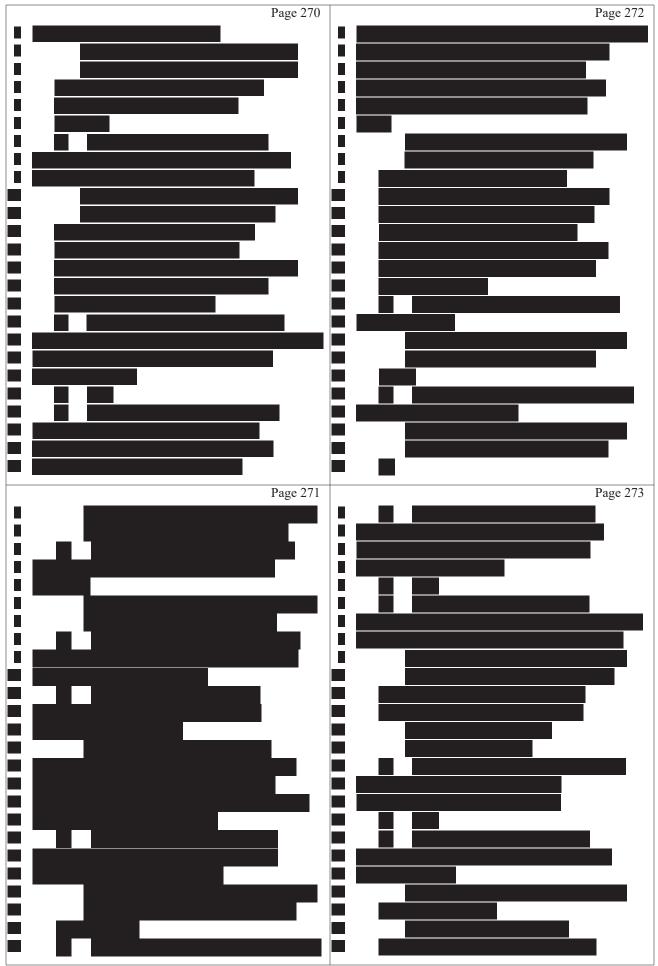


Golkow Litigation Services

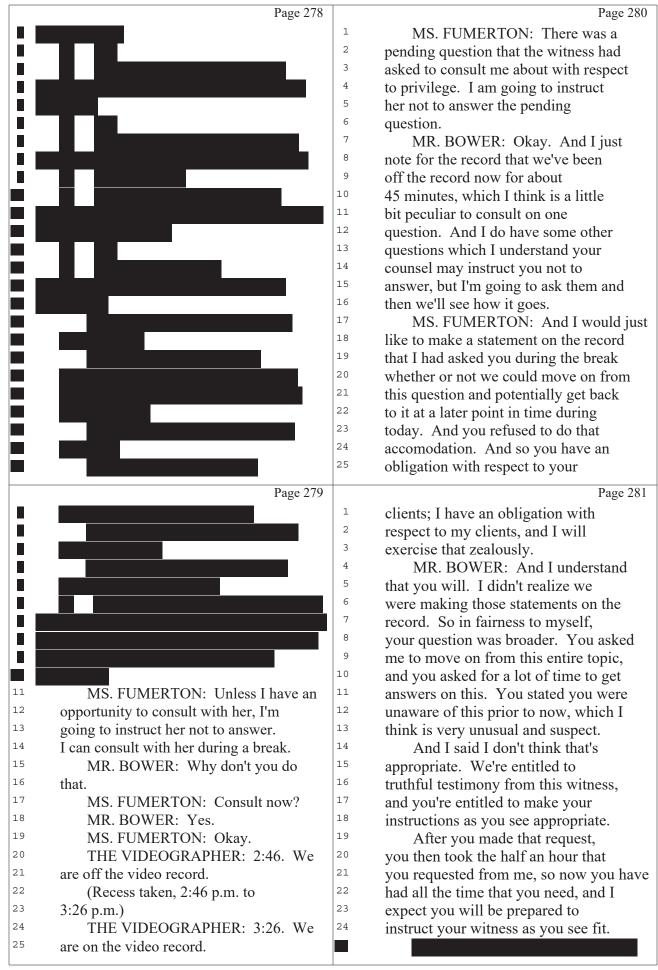
Page 66 (258 - 261)

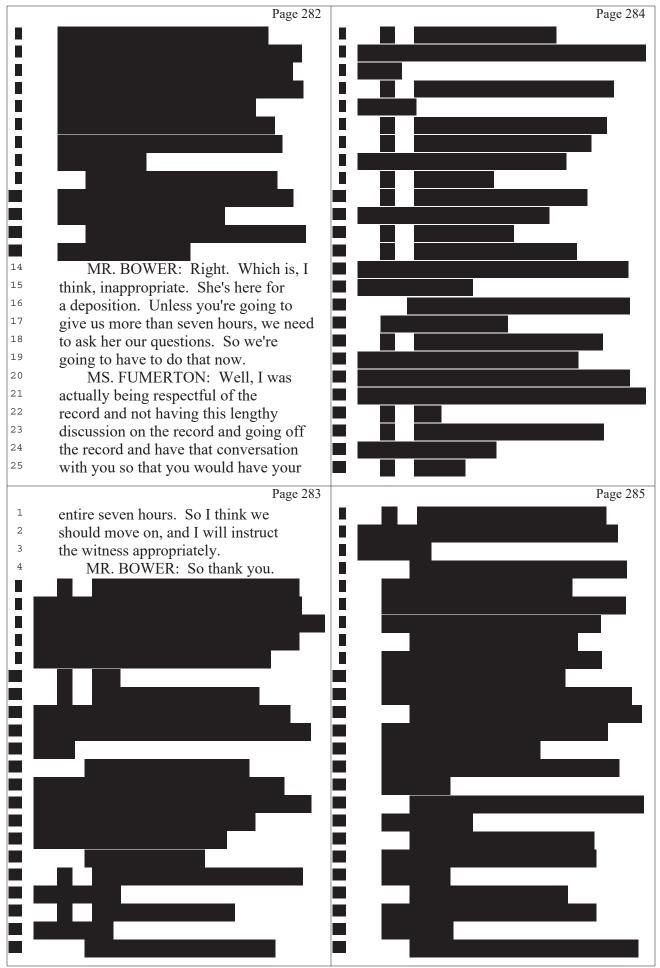


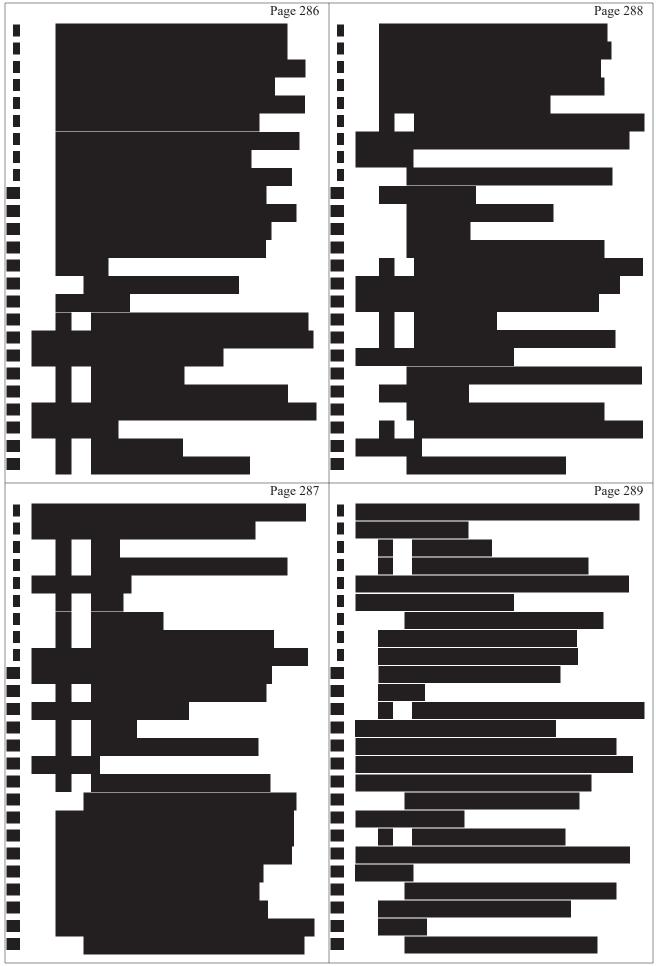






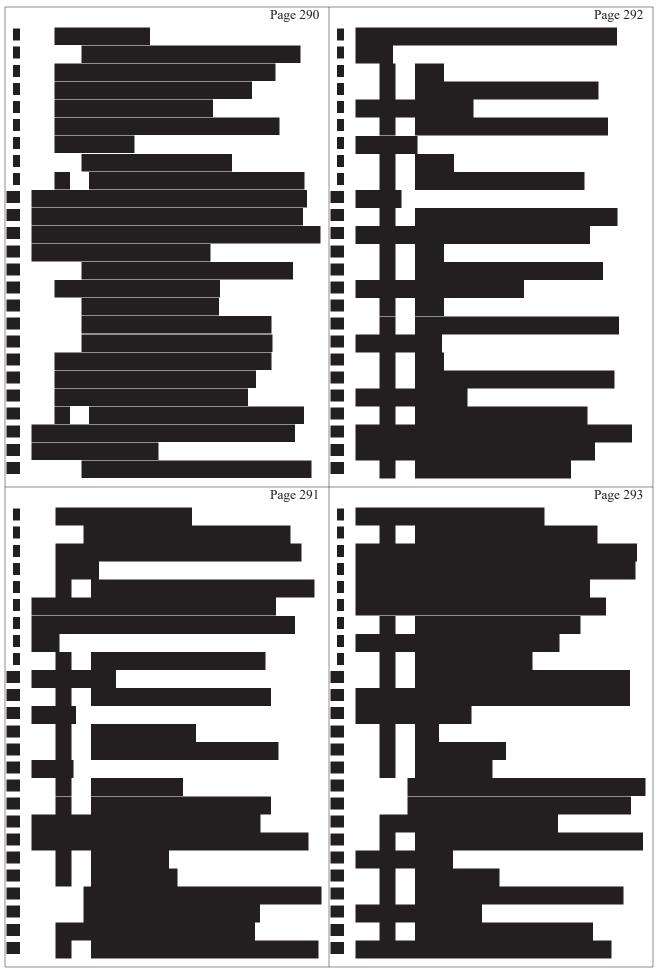






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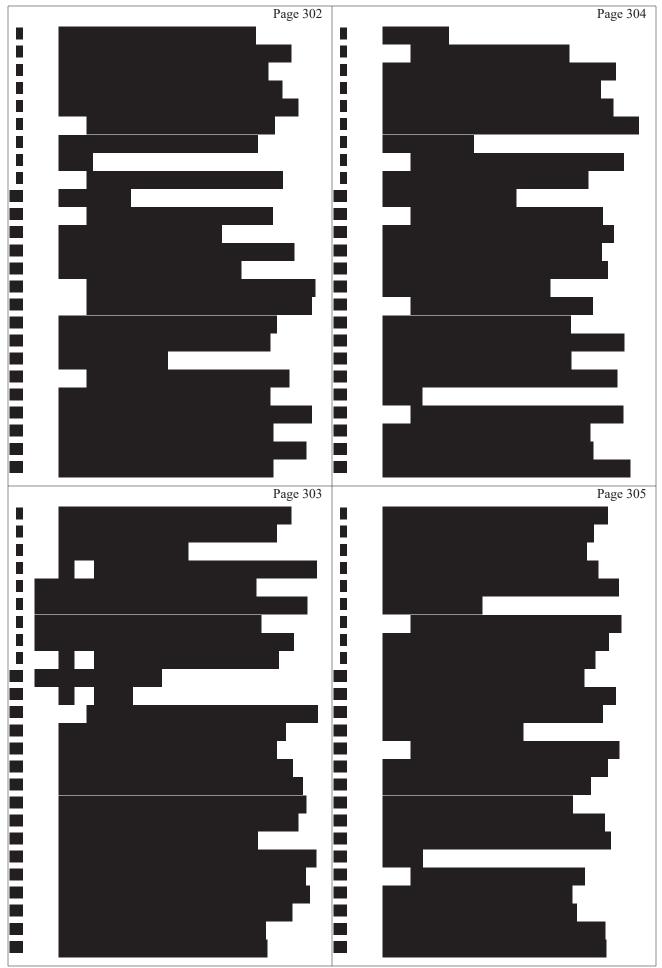
Golkow Litigation Services

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Golkow Litigation Services

Page 76 (298 - 301)



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Page 77 (302 - 305)



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Page 78 (306 - 309)



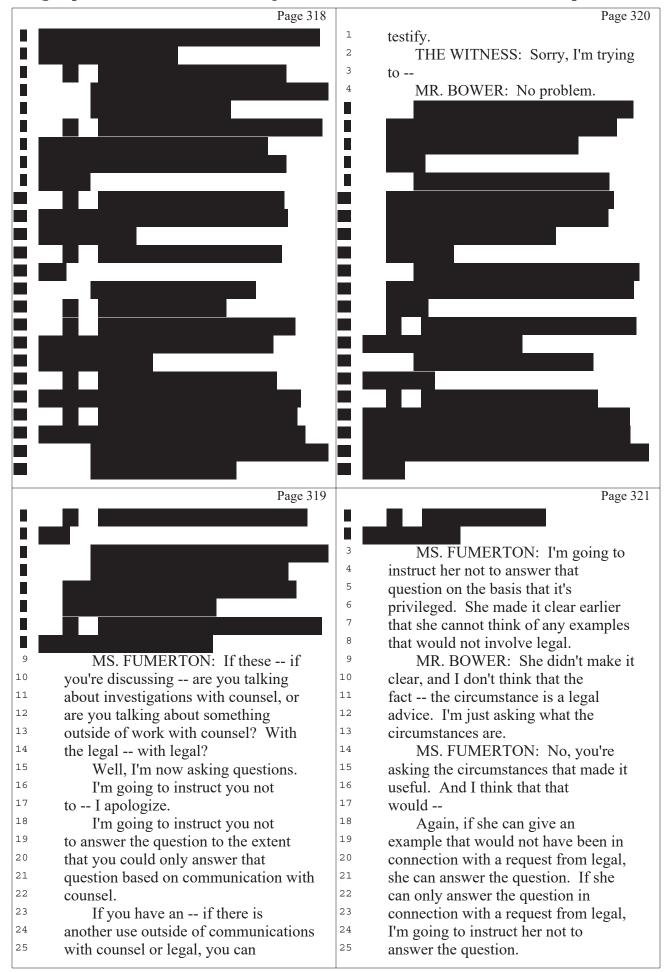
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Page 79 (310 - 313)

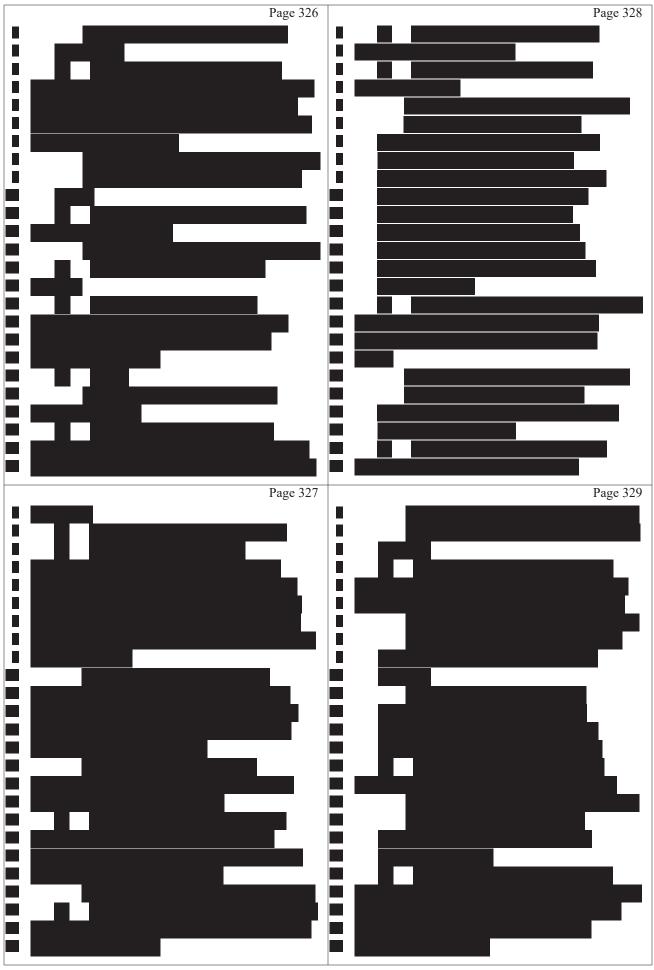


Golkow Litigation Services

Page 80 (314 - 317)

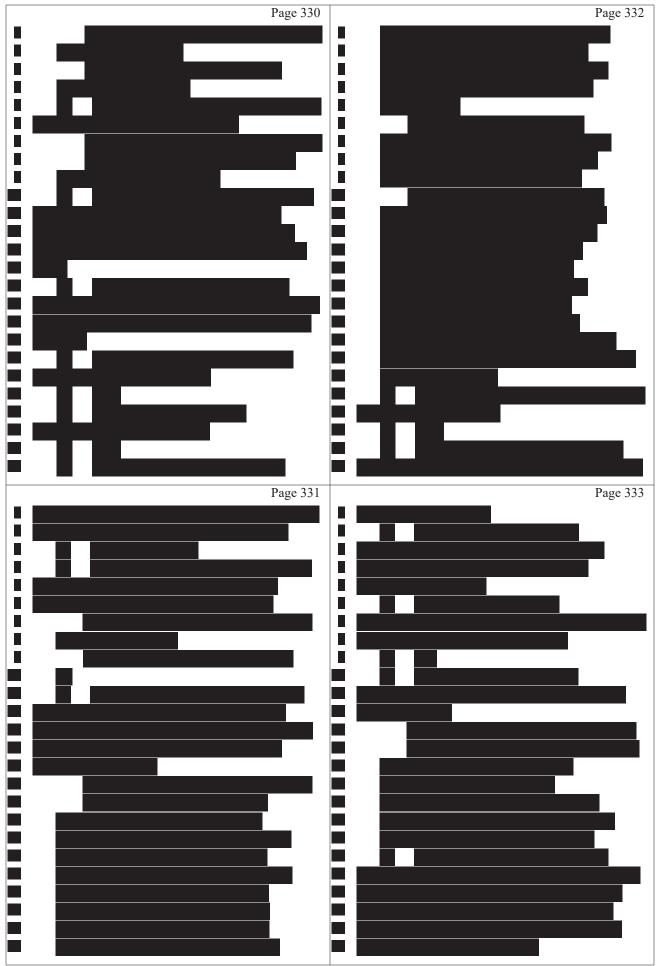


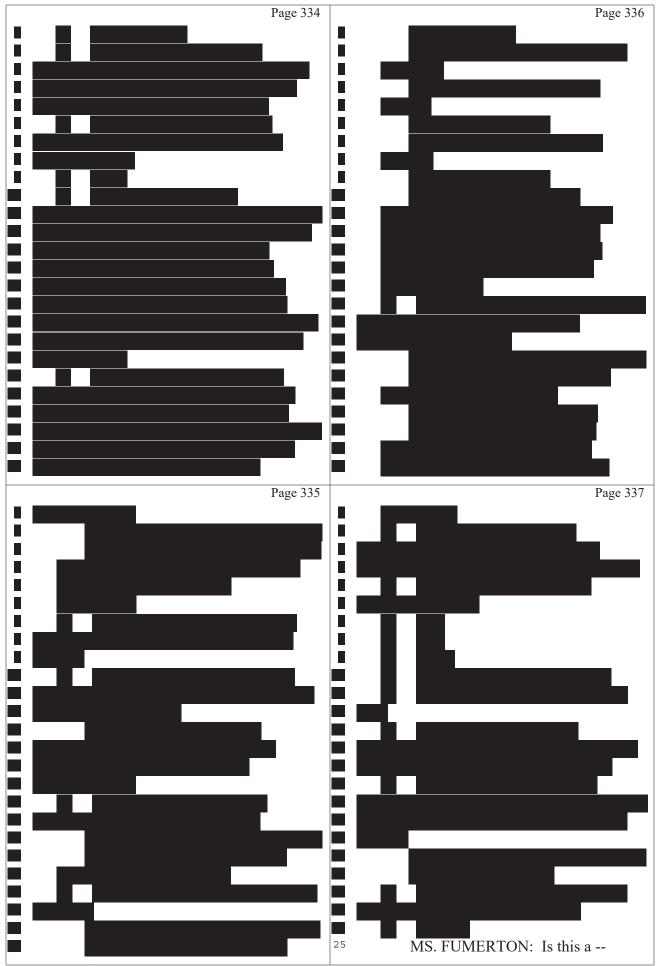


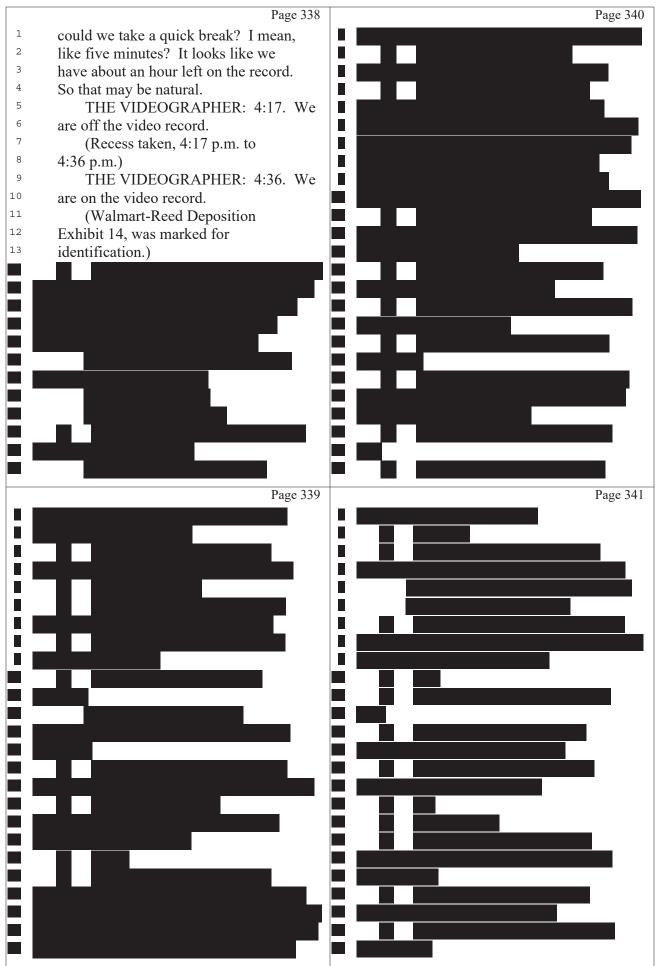


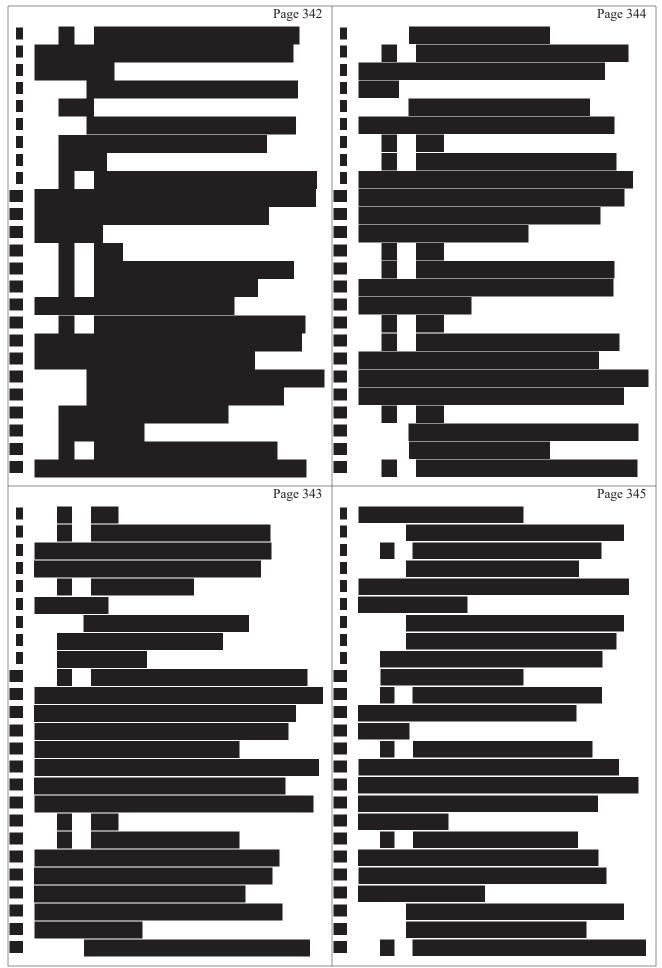
Golkow Litigation Services

Page 83 (326 - 329)



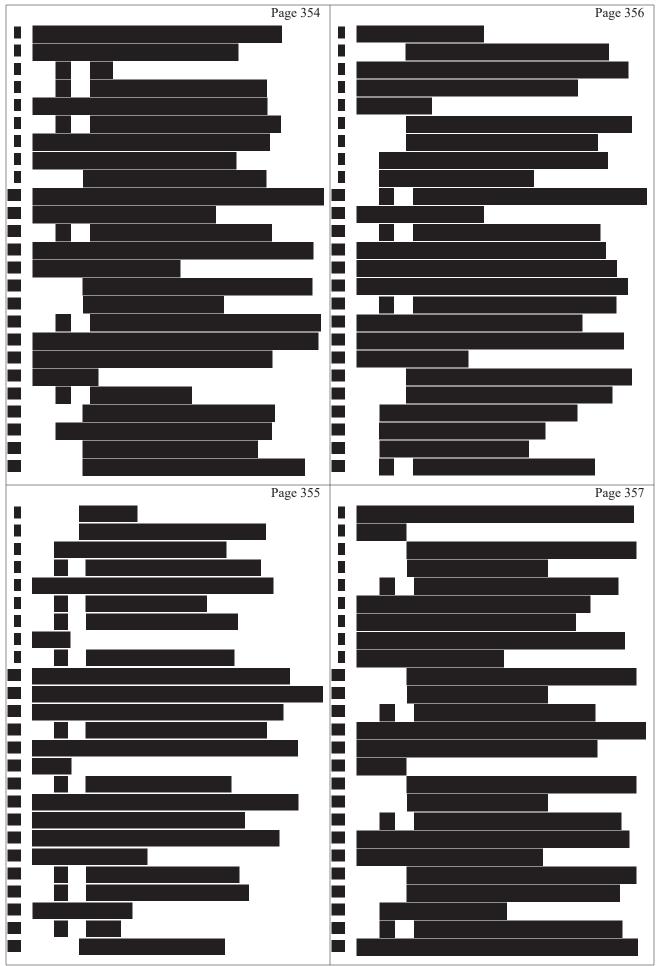


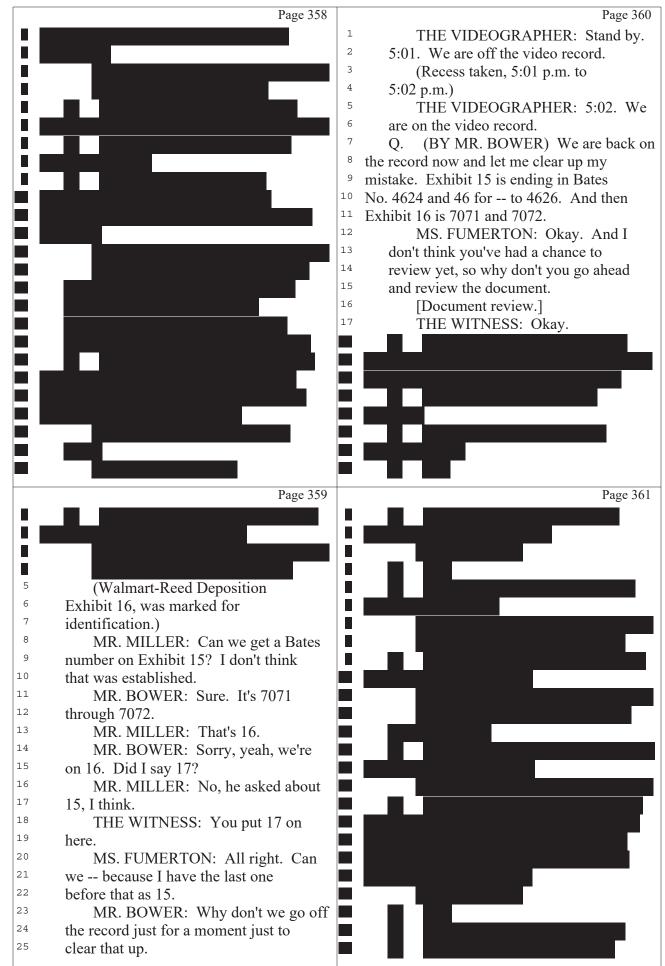


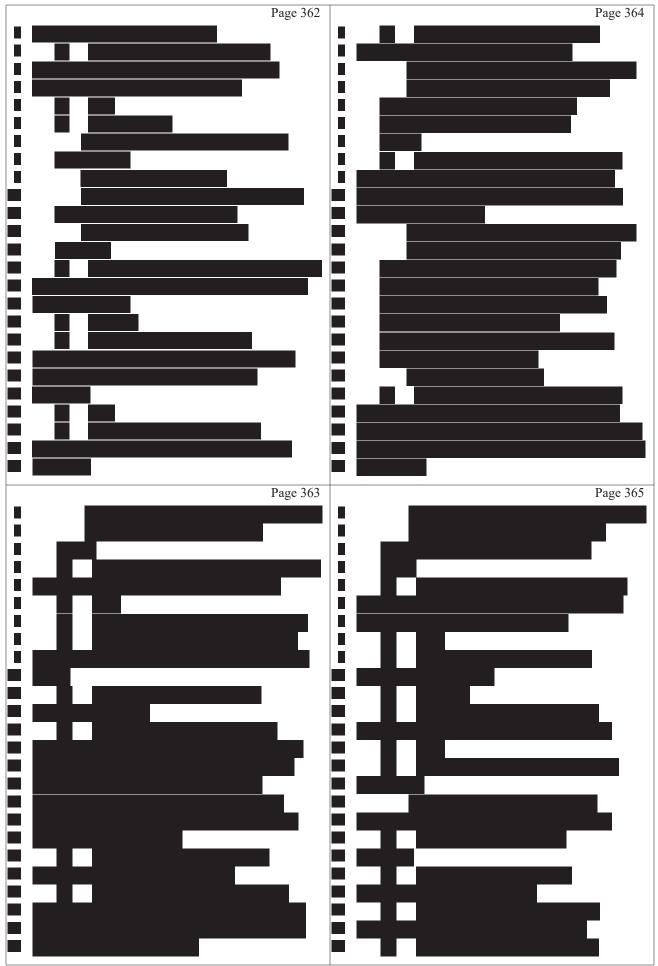








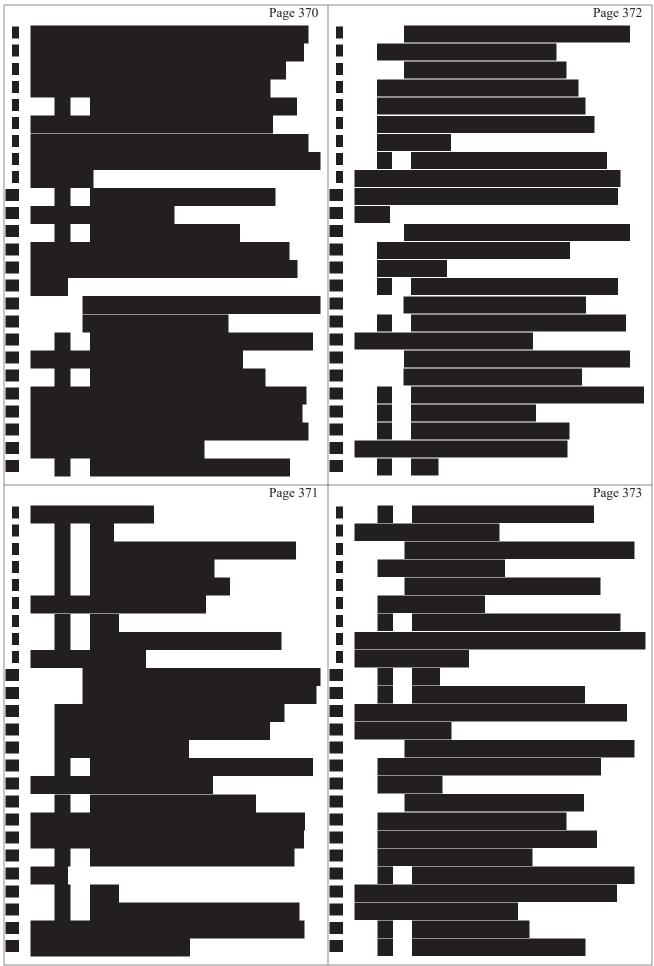




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Page 92 (362 - 365)



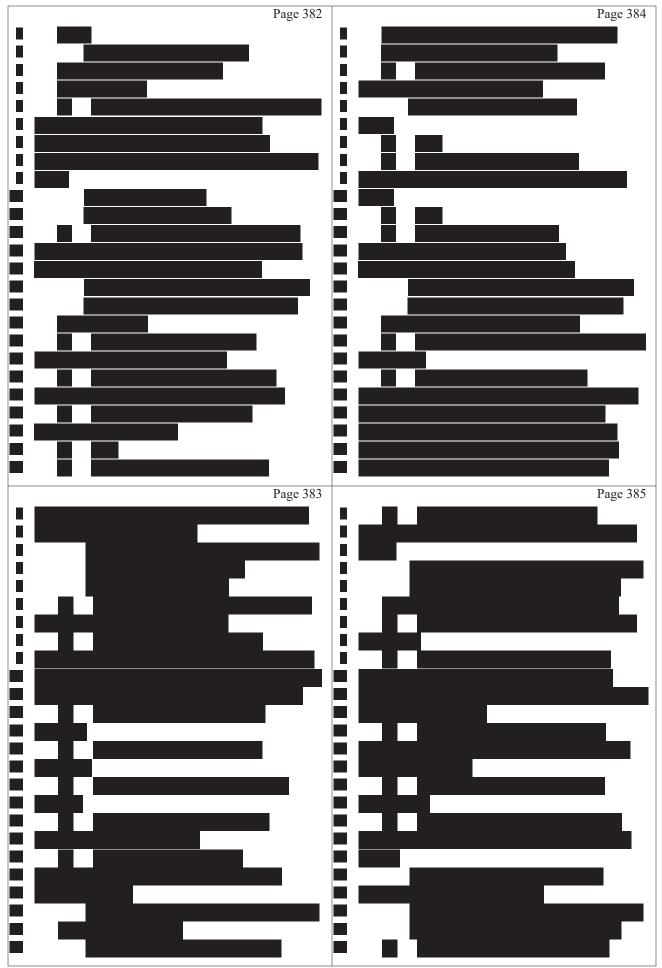


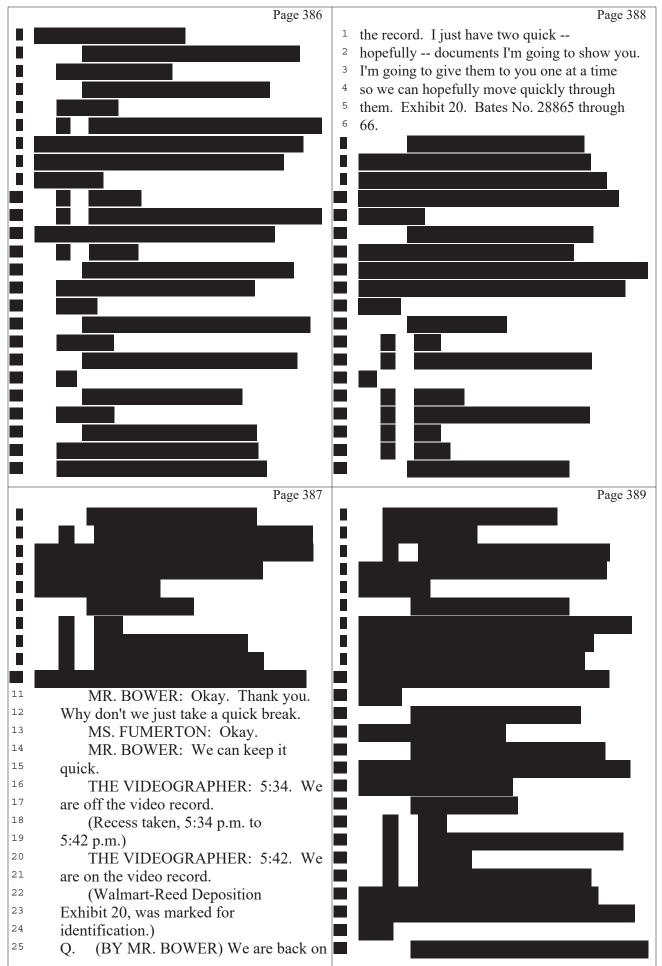


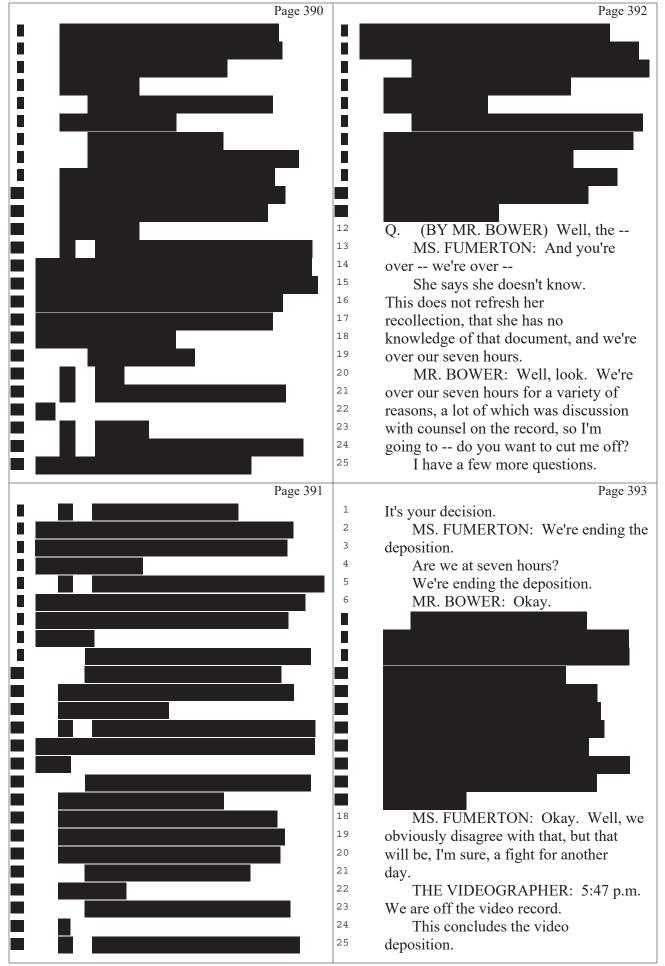
Golkow Litigation Services

Page 95 (374 - 377)









| | Page 394 | | Page 396 |
|--|--|--|--|
| 1 | (Proceedings recessed at | 1 | INSTRUCTIONS TO WITNESS |
| 2 | 5:47 p.m.) | 2 | |
| 3 | 000 | 3 | Please read your deposition over |
| 4 | 000 | 4 | carefully and make any necessary corrections. |
| 5 | | 5 | You should state the reason in the |
| 6 | | 6 | |
| 7 | | 7 | appropriate space on the errata sheet for any |
| | | | corrections that are made. |
| 8 | | 8 | After doing so, please sign the |
| 9 | | 9 | errata sheet and date it. |
| 10 | | 10 | You are signing same subject to |
| 11 | | 11 | the changes you have noted on the errata |
| 12 | | 12 | sheet, which will be attached to your |
| 13 | | 13 | deposition. |
| 14 | | 14 | It is imperative that you return |
| 15 | | 15 | the original errata sheet to the deposing |
| 16 | | 16 | attorney within thirty (30) days of receipt |
| 17 | | 17 | of the deposition transcript by you. If you |
| 18 | | 18 | fail to do so, the deposition transcript may |
| 19 | | 19 | be deemed to be accurate and may be used in |
| 20 | | 20 | court. |
| 21 | | 21 | Court. |
| 22 | | 22 | |
| 23 | | 23 | |
| 24 | | 24 | |
| 25 | | 25 | |
| 23 | | 23 | |
| | | | |
| | Page 395 | | Page 397 |
| 1 | CERTIFICATE | 1 | Page 397 ERRATA |
| 2 | CERTIFICATE L DEBRA A. DIBBLE, Registered | 1 2 | _ |
| 2 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, | | ERRATA |
| 3 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, | 2 | ERRATA Page LINE CHANGE |
| 3 4 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED | 2 | ERRATA |
| 3 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, | 2 3 4 | ERRATA Page LINE CHANGE REASON: |
| 3 4 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. | 2 3 4 5 | ERRATA Page LINE CHANGE REASON: REASON: |
| 3 4 5 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the | 2 3 4 5 | ERRATA Page LINE CHANGE REASON: REASON: |
| 2 3 4 5 6 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the | 2 3 4 5 6 7 8 | ERRATA Page LINE CHANGE REASON: REASON: |
| 2 3 4 5 6 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date | 2 3 4 5 6 7 8 | ERRATA Page LINE CHANGE REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. | 2 3 4 5 6 7 8 9 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant | 2 3 4 5 6 7 8 9 10 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party | 2 3 4 5 6 7 8 9 10 11 12 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was | 2 3 4 5 6 7 8 9 10 11 12 13 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am | 2 3 4 5 6 7 8 9 10 11 12 13 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney | 2 3 4 5 6 7 8 9 10 11 12 13 14 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 19 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action. DEBRA A. DIBBLE, RDR, CRR, CRC | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action. DEBRA A. DIBBLE, RDR, CRR, CRC NCRA Registered Diplomate Reporter | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | ERRATA Page LINE CHANGE REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 19 20 21 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action. DEBRA A. DIBBLE, RDR, CRR, CRC | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 | ERRATA Page LINE CHANGE REASON: REASON: REASON: REASON: REASON: REASON: REASON: REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 19 20 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action. DEBRA A. DIBBLE, RDR, CRR, CRC NCRA Registered Diplomate Reporter NCRA Certified Realtime Reporter Certified Court Reporter | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 | ERRATA Page LINE CHANGE REASON: REASON: |
| 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 19 20 21 | CERTIFICATE I, DEBRA A. DIBBLE, Registered Diplomate Reporter, Certified Realtime Reporter, Certified Realtime Captioner, Certified Court Reporter and Notary Public, do hereby certify that prior to the commencement of the examination, ROXANNE REED was duly sworn by me to testify to the truth, the whole truth and nothing but the truth. I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability. I DO FURTHER CERTIFY that pursuant to FRCP Rule 30, signature of the witness was not requested by the witness or other party before the conclusion of the deposition. I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action. DEBRA A. DIBBLE, RDR, CRR, CRC NCRA Registered Diplomate Reporter NCRA Certified Realtime Reporter | 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 | ERRATA Page LINE CHANGE REASON: REASON: |

| | Page 398 | |
|---|---|--|
| | | |
| 1 | ACKNOWLEDGMENT OF DEPONENT | |
| 2 | | |
| 3 | | |
| 4 | I, ROXANNE REED, do hereby certify | |
| - | that I have good the forecoing makes and that | |
| _ | that I have read the foregoing pages and that | |
| 5 | the same is a correct transcription of the | |
| | answers given by me to the questions therein | |
| 6 | propounded, except for the corrections or | |
| | changes in form or substance, if any, noted | |
| 7 | in the attached | |
| ′ | | |
| | Errata Sheet. | |
| 8 | | |
| 9 | | |
| 10 | | |
| 11 | | |
| 12 | | |
| 12 | DOMANDIE DEED DATE | |
| | ROXANNE REED DATE | |
| 13 | | |
| 14 | | |
| 15 | Subscribed and sworn to before me this | |
| 16 | day of | |
| 17 | day of, 20 My commission expires: | |
| 18 | 1113 commission expires. | |
| 1 | | |
| 19 | | |
| 20 | Notary Public | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
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